



SEPARATOR



54-00068



HAZ WASTE



COMPLIANCE



08/15/1988



N/A

Derrick

CEDAR CHEMICAL CORPORATION

REC'D AUG 15 1988

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

August 12, 1988

Mr. Mike Bates
Arkansas Department of Pollution Control & Ecology
P.O. Box 9583-8001 National Drive
Little Rock, Ar. 72290

#12

Re: Tank and Drum Storage Closure Plan

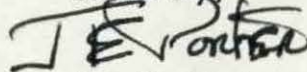
Dear Mike,

Attached is a report of sampling and analysis performed by Sorrells Research, Inc. We would appreciate the Department's review and comment on this report. There are areas of the analytical results we would like to discuss.

The Department's letter of March 24, 1988 states in Item 6 that clean closure criteria for all constituents must adhere to "non-detectable" based on the specific analytical method used. This level may not be a practical value when we consider a naturally occurring background. For example we detected arsenic in all samples, but not above what is found anywhere else.

With this in mind, please review this report and let us know your comments. Due to the long laboratory delay we may not be able to meet our 90 day timetable. We have much work yet to be done.

Sincerely,



Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt

SUMMARY OF REPORT

This document reports Field Sampling and Laboratory Analysis by Sorrells Research Associates, Inc., carried out for Cedar Chemical Corporation at West Helena, Arkansas as part of regulatory requirements for the latter's Closure Plan for Tank and Container Storage Area at the facility.

Sampling and analysis was carried out by Sorrells Research Associates, Inc. in accordance with the procedures of the United States Environmental Protection Agency Manual SW-846, November 1986, 3rd Edition, "Test Methods for Evaluating Solid Waste. "

Soil sampling was performed June 9, 1988 from the upper surface strata from a systematic grid around the Storage Tank and Container Storage Areas, as detailed herein.

Analysis was performed for those compound historically handled by Cedar Chemical at the facility. The appropriate methods from SW-846 for these materials are:

INORGANICS: Soil pH - Method 9045 Cyanide - Method 9010

METALS: Arsenic - Method 7061

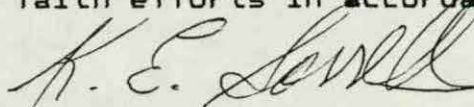
ORGANICS: Volatiles - Method 8240 ... Benzene, Carbon Disulfide, Chlorobenzene, 1,2-Dichloroethane, Methylene Chloride, Toluene, and Xylenes

Semi-Volatiles - Method 8270...Isophorone and Phenol

Chain of Custody Document is attached.

Field and Trip Blanks were analyzed. Replication and Recovery and Surrogate Recovery Data were determined. Summary Documentation of Analytical Procedures by analyst, analysis start times, replication and recovery results by sets are included.

I certify this is a true and correct report of the analysis performed, and that the procedures described have been implemented with good faith efforts in accordance with good laboratory practices.



K. E. Sorrells, M.S., Fellow, American Institute of Chemists

SAMPLING PLAN

A. Field Planning

The soil sampling program was undertaken to determine the extent of soil contamination, if any, in the area. The Storage tank is surrounded by concrete and asphalt on three sides. It was determined to take three samples from the remaining side (North).

It was determined to collect soil samples from each side of the Container Storage Area, at intervals not to exceed 10 feet, at a distance not to exceed one foot from the edge of the concrete base, and at a depth not to exceed that of the standard collection container, the wide-mouth liter borosilicate glass with Teflon-lined cap. It was determined to use stainless steel soil sampling equipment, including the split spoon tube sampler, auger, trowel, and spatula, as appropriate.

SAMPLING PLAN

- B. Field Equipment. (See Method Documentation Section for Laboratory Equipment.)

SPECIAL COLLECTION REQUIREMENTS

1. Soil samples were collected using stainless steel soil sampling equipment including the split spoon tube sampler, auger, trowel, and spatula.

FIELD MEASUREMENTS

2. Field observations were recorded in the Field Supervisor's Field Log.

No soil analysis was performed in the field.

CONTAINERS AND PRESERVATION

3. For GC-MS extractables, the I-Chem Research wide-mouth Borosilicate glass liter bottles with teflon-liner caps were used.

I-Chem Research EPA protocol 40-ml, septum-capped vials were used to collect duplicate samples for GC-MS purgeables.

I-Chem Research wide-mouth Borosilicate glass liter bottles with teflon-lined caps were used for all other samples, field blanks and trip blank.

4. Waterproof tags or labels for sample marking. These were made out by C. A. Sorrells, as he kept the permanent field log, and fastened securely to each sample container, as the samples were collected and preserved. Field preservation of samples was accomplished by cooling to 4 degrees Celsius with crushed ice.

SAMPLING PLAN

Section C

Sampling Procedure: A minimum number of trained persons are to be involved in sample collection and handling. For this project, the samplers were C.A. Sorrells, and M. G. Martin. Observer for Cedar Chemical was J. E. Porter.

1. Distances along the Storage Areas edges were measured for representative sampling points. These were selected by C.A. Sorrells, determined by pacing.
2. Soil samples were collected by M. G. Martin, using the stainless steel auger with 1 inch spoon attachment. Collections were made to approximately 4.5 inch deep by 3 inch diameter. Approximately 24 oz soil was collected at each sample site. The auger attachment was rinsed between samples with distilled water. Samples were placed in I-Chem Research wide-mouth glass, Teflon-lined-cap containers.
3. Sampling devices was cleaned before and after each sample was taken, per Quality Assurance/Quality Control (QA/QC) procedures, Section 6, Paragraph D, Sorrells Research Associates Quality Assurance plan. (SRA QAP). (Disposable tissues.)

Soil from successive collections at a sample point were combined and gently mixed in order to insure both the homogeneity and the integrity of the sample. This was accomplished by C.A. Sorrells, who also filled EPA vials for volatiles analysis.

4. Field duplicates were taken for two of the eighteen sites, per QA/QC procedures, (SRA QAP)
5. Field blanks were provided by the laboratory, in accordance with QA/QC procedures, (SRA QAP). Field blanks were provided to document absence of contamination or introduction of extraneous-origin analytes or interferences.

6. The following information was recorded on the sample tag or label.

Site number:

Date: Time:

Name of Collector:

Preservation Used:

Analysis Required:

This work was accomplished by C. A. Sorrells, who also provided the proper preservation for each sample, according to required analysis for the respective aliquots by container.

7. A hard-covered bound Field Book was used to record the same data as was listed on the sample tag, plus other field notes. This log was kept by C. A. Sorrells.
8. Samples were preserved by immediately by chilling the sample jar in a durable ice chest with crushed ice.
9. Chain of Custody Forms were completed. Copy attached.
10. Samples were transported immediately by Sorrells Research Associates, Inc. to the laboratory in Little Rock, Arkansas for Analysis.

C145.001 - .004
 CEDAR CHEMICAL CORPORATION
 HIGHWAY 252 SOUTH
 WEST HELENA AR 72390

ANALYTE	PLANT EAST SOUTH 20'	PLANT EAST SOUTH 10'	PLANT EAST CENTER	PLANT EAST NORTH 10'
	Mg/kg w/w	Mg/kg w/w	Mg/kg w/w	Mg/kg w/w
Benzene	< .01	< .01	< .01	< .01
Carbon Disulfide	< 0.1	< 0.1	< 0.1	< 0.1
Chlorobenzene	< .01	< .01	< .01	< .01
1,2-Dichloroethane	< .01	< .01	< .01	< .01
Methylene Chloride	< .01	< .01	< .01	< .01
Toluene	< 0.05	< 0.05	< 0.05	< 0.05
Xylene	< 0.05	< 0.05	< 0.05	< 0.05
Isophorone	< .01	< .01	< .01	< .01
Phenol	< 0.02	< 0.02	< 0.02	< 0.02
Arsenic	1.44	1.38	4.38	1.75
Cyanide	< 0.05	< 0.05	< 0.05	< 0.05
pH (Units)*	8.31 *	8.51 *	8.55 *	8.03 *
Total Solids (%) **	97 **	89.4 **	92.1 **	89.3 **

C145.005 - .008
CEDAR CHEMICAL CORPORATION
HIGHWAY 252 SOUTH
WEST HELENA AR 72390

ANALYTE	PLANT EAST NORTH 20'	PLANT WEST SOUTH 20'	PLANT WEST SOUTH 10'	PLANT WEST CENTER
	Mg/kg w/w	Mg/kg w/w	Mg/kg w/w	Mg/kg w/w
Benzene	< .01	< .01	< .01	< .01
Carbon Disulfide	< 0.1	< 0.1	< 0.1	< 0.1
Chlorobenzene	< .01	< .01	< .01	< .01
1,2-Dichloroethane	< .01	< .01	< .01	< .01
Methylene Chloride	< .01	< .01	< .01	< .01
Toluene	< 0.05	< 0.05	< 0.05	< 0.05
Xylene	< 0.05	< 0.05	< 0.05	< 0.05
Isophorone	< .01	< .01	< .01	< .01
Phenol	< 0.02	< 0.02	< 0.02	< 0.02
Arsenic	2.25	2.13	3.13	2.13
Cyanide	< 0.05	< 0.05	< 0.05	< 0.05
pH (Units)*	8.02 *	8.67 *	8.43 *	8.26 *
Total Solids (%) **	88.4 **	95.7 **	83.5 **	91.6 **

C145.009 - .012
CEDAR CHEMICAL CORPORATION
HIGHWAY 252 SOUTH
WEST HELENA AR 72390

ANALYTE	PLANT WEST NORTH 10'	PLANT WEST NORTH 20'	PLANT SOUTH WEST 10'	PLANT SOUTH EAST 10'
	Mg/kg w/w	Mg/kg w/w	Mg/kg w/w	Mg/kg w/w
Benzene	< .01	< .01	< .01	< .01
Carbon Disulfide	< 0.1	< 0.1	< 0.1	< 0.1
Chlorobenzene	< .01	< .01	< .01	< .01
1,2-Dichloroethane	< .01	< .01	< .01	< .01
Methylene Chloride	< .01	< .01	< .01	< .01
Toluene	< 0.05	< 0.05	< 0.05	< 0.05
Xylene	< 0.05	< 0.05	< 0.05	< 0.05
Isophorone	< .01	< .01	< .01	0.011
Phenol	< 0.02	< 0.02	< 0.02	< 0.02
Arsenic	2.88	2.50	2.75	1.69
Cyanide	< 0.02	.026	< 0.02	< 0.02
pH (Units)*	8.26 *	8.33 *	8.20 *	8.36 *
Total Solids (%) **	91.7 **	97.1 **	93 **	99.8 **

C145.013 - .016
CEDAR CHEMICAL CORPORATION
HIGHWAY 252 SOUTH
WEST HELENA AR 72390

ANALYTE	PLANT NORTH WEST 10'	PLANT NORTH CENTER	PLANT NORTH EAST 10'	TANK NORTH EAST 10'
	Mg/kg w/w	Mg/kg w/w	Mg/kg w/w	Mg/kg w/w
Benzene	< .01	< .01	< .01	< .01
Carbon Disulfide	< 0.1	< 0.1	< 0.1	< 0.1
Chlorobenzene	< .01	< .01	< .01	< .01
1,2-Dichloroethane	< .01	< .01	< .01	< .01
Methylene Chloride	< .01	< .01	< .01	< .01
Toluene	< 0.05	< 0.05	< 0.05	< 0.05
Xylene	< 0.05	< 0.05	< 0.05	< 0.05
Isophorone	0.01	< .01	< .01	< .01
Phenol	< .02	< .02	< .02	< .02
Arsenic	4.91	2.44	9.44	1.38
Cyanide	< 0.05	< 0.05	< 0.05	< 0.05
pH (Units)*	8.36 *	8.30 *	8.40 *	8.72 *
Total Solids (%) **	97.6 **	90.2 **	96.4 **	91.1 **

C145.017 - .018
CEDAR CHEMICAL CORPORATION
HIGHWAY 252 SOUTH
WEST HELENA AR 72390

ANALYTE	TANK NORTH CENTER	TANK NORTH WEST 10'
	Mg/kg w/w	Mg/kg w/w
Benzene	< .01	< .01
Carbon Disulfide	< 0.1	< 0.1
Chlorobenzene	< .01	< .01
1,2-Dichloroethane	< .01	< .01
Methylene Chloride	< .01	< .01
Toluene	< 0.05	< 0.05
Xylene	< 0.05	< 0.05
Isophorone	< .01	< .01
Phenol	< 0.02	0.016+- 0.002
Arsenic	1.50	0.857
Cyanide	.057	.229
pH (Units)*	8.88 *	12.12 *
Total Solids (%) **	84.7 **	78.2 **

C145.001 - .018 CEDAR CHEMICAL 06/09/88

GC-MS PURGEABLES / MGM / 6-13-88 / 0830 / SR 86 %
BENZENE / KES / 6-13-88 / 1500 / 0.01 MG/KG
CARBON DISULFIDE / KES / 6-13-88 / 1500 / 0.1 MG/KG
CHLOROBENZENE / KES / 6-13-88 / 1500 / 0.01 MG/KG
1,2-DICHLOROETHANE / KES / 6-13-88 / 1500 / < 0.01 MG/KG
METHYLENE CHLORIDE / KES / 6-13-88 / 1500 / 0.01 MG/KG
TOLUENE / KES / 6-13-88 / 1500 / 0.01 MG/KG
XYLENE / 6-13-88 / KES / 1500 / < 0.02 MG/KG
GC-MS EXTRACTABLES / MGM / 6-14-88 / 0830 / SR 109 %
ISOPHORONE / KES / 6-20-88 / 0830 / < 0.01 MG/KG
PHENOL / KES / 6-20-88 / 0830 / .01 MG/KG
ARSENIC / KES II / 6-14-88 / 1500 / 5%, 4%
CYANIDE / 001 - 008 / MGM / 6-16-88 / < 0.02 MG/KG
CYANIDE / 009 - 018 / MGM / 6-20-88 / 0%
pH / PLD / 6-9-88 / 1000 / 1.5%
TOTAL SOLIDS / PLD / 6-17-88 / 0 %, 0 %

ANALYTE / ANALYST / BEGAN / STD. DEVIATION OF MEAN

SR = SURROGATE RECOVERY

GC-MS PRECISION AT D.L. RECOVERIES FROM SPIKED SAMPLES
AT 2 MG/KG. INORGANIC ON SELECTED SAMPLE RESPONSES

METHOD DETECTION LIMITS FOR TOLUENE, XYLENE AND CN- ARE
3X TO 5X INSTRUMENT DETECTION LIMITS BECAUSE OF A BLANK
CORRECTION FOUND NECESSARY AFTER REVIEWING BLANKS OF
INTERNAL STANDARDS AND SOIL FREE FROM CONTAMINATION.

TABLE ____ BFB KEY ION ABUNDANCE CRITERIA

Mass	Ion Abundance Criteria	Found
50	15 to 40 % of mass 95	20%
75	30 to 60% of mass 95	53%
95	base peak, 100% relative abundance	100%
96	5 to 9% of mass 95	9%
173	less than 2% of mass 95	<1%
174	greater than 50 % of mass 95	100%
175	5 to 9% of mass 174	7%
176	greater than 95% but less than 101% of mass 174	92%
177	5 to 9% of mass 176	10%

Scan(s) 778

Analyst K. E. Sorrells

Date/Time 8/8/88

TABLE __ BFB KEY ION ABUNDANCE CRITERIA

Mass	Ion Abundance Criteria	Found
50	15 to 40 % of mass 95	18%
75	30 to 60% of mass 95	45%
95	base peak, 100% relative abundance	100%
96	5 to 9% of mass 95	7%
173	less than 2% of mass 95	<1%
174	greater than 50 % of mass 95	99%
175	5 to 9% of mass 174	<1%
176	greater than 95% but less than 101% of mass 174	98%
177	5 to 9% of mass 176	

Scan(s) 654

Analyst K. E. Sorrells

Date/Time 8/9/88

TABLE __ DFTPP KEY ION ABUNDANCE CRITERIA

Mass	Ion Abundance Criteria	Found
51	30 to 60% of mass 198	88%
68	<2% of mass 69	<1%
70	<2% of mass 69	<1%
127	40-60% of mass 198	53%
197	<1% of mass 198	<1%
198	base peak, 100% relative abundance	100%
199	5-9% of mass 198	<2%
275	10-30% of mass 198	18%
365	>1% of mass 198	<1%
441	present but less than 443	14%
442	>40% of mass 198	71%
443	17-23% of mass 442	22%

Scan(s) 1387

Analyst K. E. Sorrells

Date/Time 6/16/88 1030

TABLE ____ DFTPP KEY ION ABUNDANCE CRITERIA

Mass	Ion Abundance Criteria	Found
51	30 to 60% of mass 198	41%
68	<2% of mass 69	<1%
70	<2% of mass 69	<1%
127	40-60% of mass 198	34%
197	<1% of mass 198	<1%
198	base peak, 100% relative abundance	100%
199	5-9% of mass 198	6%
275	10-30% of mass 198	18%
365	>1% of mass 198	>1%
441	present but less than 443	9%
442	>40% of mass 198	48%
443	17-23% of mass 442	22%

Scan(s) 325

Analyst K. E. Sorrells

Date/Time 6/20/88

TABLE __ DFTPP KEY ION ABUNDANCE CRITERIA

Mass	Ion Abundance Criteria	Found
51	30 to 60% of mass 198	58%
68	<2% of mass 69	<1%
70	<2% of mass 69	<1%
127	40-60% of mass 198	42%
197	<1% of mass 198	<1%
198	base peak, 100% relative abundance	100%
199	5-9% of mass 198	6%
275	10-30% of mass 198	18%
365	>1% of mass 198	>1%
441	present but less than 443	<1%
442	>40% of mass 198	34%
443	17-23% of mass 442	23%

Scan(s) 817

Analyst K. E. Sorrells

Date/Time 6/27/88

C145

CHAIN OF CUSTODY RECORD

Pg 10/2

June 9, 1988

NAME OF COMPANY, CITY, OR PROJECT: West Helena Ark.

SAMPLERS: (signature)

CEDAR CHEMICAL Corp

C. E. Sorrells / Michael S. Martin

SAMPLE COLLECTION LOCATION	DATE	TIME	COMP	GRAB	NO. OF CONTAINERS - ANALYSIS REQUIRED
#1 Plant East Center South 20' From	6-9-88	11:26		✓	1 See list Attached
#2 Plant East Center South 10' From	"	11:41		✓	1 "
#3 Plant East Center	"	11:32		✓	1 "
#4 Plant East Center North 10' From	"	11:45		✓	1 "
#5 Plant East Center North 20' From	"	11:50		✓	1 "
#6 Plant West Center South 20' From	"	11:53		✓	1 "
#7 Plant West Center South 10' From	"	12:00		✓	1 "
#8 Plant West Center	"	12:04		✓	1 "
#9 Plant West Center 10' North From	"	12:10		✓	1 "

CONT'D ON Pg 2

RELINQUISHED BY: (signature)

JOE E. FORTER JUN 9, 1988

RECEIVED BY: (signature)

DATE/TIME

K. E. Sorrells 6-9-88 420 PM

DISPATCHED BY: (signature)

RECEIVED FOR LABORATORY BY: DATE/TIME

K. E. Sorrells 6-9-88 420 PM

Method of Shipments:
(CIRCLE ONE)

UPS

BUS

WALK-IN

SRA COURIER

OTHER COURIER

NOTES:

* Field Note in Hard bound Book 6-9-88 MS

CHAIN OF CUSTODY RECORD

Pg 2 of 2

June 9, 1988

NAME OF COMPANY, CITY, OR PROJECT:		SAMPLERS: (signature)			
		C. A. Smith / Michael S. Martin			
SAMPLE COLLECTION LOCATION	DATE	TIME	COMP	GRAB	NO. OF CONTAINERS - ANALYSIS REQUIRED
#10 Plant West ^{20' North from center}	6-9-88	12:16		✓	1 S. & L. Attached
#11 ^{10' west of center} South end of slab	"	12:20		✓	1 "
#12 ^{10' East of center} South end of slab	"	12:24		✓	1 "
#13 ^{10' west of center} North end of slab	"	12:30		✓	1 "
#14 ^{center} North end of slab	"	12:33		✓	1 "
#15 ^{10' East of center} North end of slab	"	12:39		✓	1 "
#16 ^{10' from center} North tank East	"	1:00		✓	1 "
#17 North tank center	"	1:10		✓	1 "
#18 ^{10' from center} North tank west	"	1:16		✓	1 "

RELINQUISHED BY: (signature)

JOE R. PORTER June 9, 1988

RECEIVED BY: (signature)

DATE/TIME

C. A. Smith / Michael S. Martin 6-9-88

DISPATCHED BY: (signature)

RECEIVED FOR LABORATORY BY: DATE/TIME

K. E. Smith 6-9-88 4:20 P.M.

Method of Shipments
(CIRCLE ONE)

UPS

BUS

WALK-IN

SRA COURIER

OTHER COURIER

NOTES: * SAME

ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

MEMORANDUM

TO : File

THROUGH : Gary Martin, Manager, Technical Branch *Gary*

FROM : Derick Warrick, Inspection Engineer II

DATE : 3-AUG-1988

SUBJECT : Cedar Chemical

Joe Porter of Cedar Chemical called me at 2:25 p.m., August 1, 1988, and asked me when was the official date for the starting of time-lines for their closure activities. After some discussion, we agreed it would be the letter Mike sent approving the soil sampling locations which were received prior. Mr. Porter then stated they were sixty (60) days into their closure plan and they were still waiting on official results from the laboratory concerning soil samples. I explained if he needed extra time for closure activities, he would simply have to submit an extension request.

DW/ckh:MEM86

Derick -


8-03-88

The proper response was given so long as the justification/rationale meets reg. restriction. Time extensions must not delay required corrective actions though.

gfm

ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

MEMORANDUM

TO : Gary Martin, Manager, Technical Branch
FROM : Derick Warrick, Inspection Engineer II 
DATE : 18-JUL-1988
SUBJECT : Cedar Chemical Corporation


At 1:15 p.m., I called Mr. Joe Porter at Cedar Chemical Corporation. I explained the results he had received from the soil testing were well out of the scope of "non-detectable" and they must follow the guidelines of the approved closure plan for any found contaminated soils. He stated they were going to do some retesting and said they may need an extension to the time frames of their closure plan. I told him to request for one in writing if he had any problems meeting time frames. I also told him to keep us updated on the retesting and any removal of soils they may try to do and to call us if they had any questions.

DW/ckh:MEM79

CSN: 540068 Permit No.
Media: Air, Water, Land, Hazardous
Sort: Permit, Compliance, Legal, Misc.

ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

MEMORANDUM

TO : Gary Martin, Manager, Technical Branch
FROM : Derick Warrick, Inspection Engineer II 
DATE : 15-JUL-1988
SUBJECT : Cedar Chemical Corp.

At approximately 10:45 a.m., Joe Porter of Cedar Chemical called and updated me on the results of the soil analysis for their closure plans. The results showed detectable limits. Toluene was found in 11 of 18 samples conducted, xylene was found in 15 out of 18, cyanide and arsenic were found in all samples. All results were in the low ppb range, however. When asked, Mr. Porter stated only one lab was used (Sorrells) and no blanks or spikes were used. Mr. Porter was concerned that maybe the lab was too sensitive in their testing procedures and asked what should his next step be. I conveyed the samples were not too sensitive for the ultimate goal of "non-detectable" requirements. I stated I would get back to him Monday to state the Department's position on the matter.

DW/ckh:MEM77



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

June 13, 1988

Mr. Joe Porter
Environmental Engineer
Cedar Chemical Corporation
P.O. Box 2749
West Helena, AR 72390

CSN: 540068 Permit No.
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

Dear Joe:

The Department has completed evaluation of the results of analysis on the sludges, sediments and liquids in the surface impoundments which were submitted by you on April 27, 1988.

As the results of the analysis indicate that no hazardous constituents were detected at significant levels, the requirements of paragraph 9 of the CAO are hereby deemed satisfied.

If you have any questions in this matter, please feel free to call.

Sincerely,

Karen Deere
Enforcement Branch Manager
Hazardous Waste Division

KD:fw:1252

cc: Legal, ADPC&E



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

June 8, 1988

Mr. Joe E. Porter
Environmental Engineer
Cedar Chemical Corp.
P. O. Box 2749
West Helena, AR 72390

RE: Cedar Chemical Corp.
Tank and Container Storage Closure Billings

Dear Mr. Porter:

Please find enclosed the invoice for the tank and container storage closure review fees. The final closure of the units will be deemed incomplete and therefore not approved until all corresponding fees for each unit is paid in full.

If you should have any questions or concerns, please feel free to call.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Bates", is written over the typed name.

Mike Bates
Chief
Hazardous Waste Division

DW/ckh:LTR153

Enclosures

cc: Gary Martin, Manager, Technical Branch
✓ D. G. Warrick, Inspection Engineer, Technical Branch



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

HAZARDOUS WASTE
PERMIT FEE
INVOICE

CEDAR CHEMICAL CORPORATION
PO BOX 2749
WEST HELENA ARKANSAS 72390

Invoice No. H-0049

Department
Federal I. D.# 71-0388878

CLOSURE PLAN REVIEW FEE FOR CEDAR CHEMICAL CORPORATION

CSN: 54-0068

DATE BILLED: JUNE 9, 1988

DATE DUE: JULY 24, 1988

CLOSURE PLAN REVIEW FEE DUE:

\$2,500.00

ID NUMBER: ARD990660649

REFER TO: ARKANSAS HAZARDOUS WASTE MANAGEMENT CODE - SECTION 11)

PLEASE: MAKE CHECK OR MONEY ORDER PAYABLE TO ADPCE
WRITE INVOICE NUMBER (SHOWN AT TOP OF THIS INVOICE)
ON THE CHECK
MAIL TO ADPCE AT ADDRESS ABOVE, MARKED "ATTN: PERMITS
BRANCH"

File



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

June 6, 1988

Joe E. Porter
Environmental Engineer
Cedar Chemical
P.O. Box 2749
West Helena, AR 72390

CSN: 540068 Permit No.
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

Dear Mr. Porter:

RE: Part B Application
Tanks T-PEZ09, T-002

The request for the withdrawal of Tanks T-PEZ09 and T-002 from the original Part B application is hereby approved. This decision is based on the premise the tanks were used only as temporary storage under RCRA definitions of less than 90 days for temporary storage classification.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Bates".

Mike Bates
Chief
Hazardous Waste Division

MB:fw:1239

cc: Gary Martin, ADPC&E
Becky Keogh, ADPC&E
D.G. Warrick, ADPC&E



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

May 24, 1988

Mr. Joe Porter
Environmental Engineer
Cedar Chemical Corp.
P. O. Box 2749
West Helena, AR 72390

RE: Cedar Chemical Corporation
Final Closure
Tank and Container Storage

Dear Mr. Porter:

We have reviewed the submitted drawing with soil sample locations supplied by Cedar Chemical Corp. dated May 15, 1988.

The map detail is deemed adequate, therefore, all sampling activities can commence within the time frames of the approved closure plan, however, any additional sampling which the independent professional engineer may require will be accepted.

Sincerely,

A handwritten signature in cursive script that reads "Mike Bates".

Mike Bates
Chief
Hazardous Waste Division

DW/ckh:LTR144

cc: Gary Martin, ADPC&E
D. G. Warrick, ADPC&E



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

May 16, 1988

CSN: 540068 Permit No.
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

Mr. Joe Porter
Environmental Engineer
Cedar Chemical Corporation
P.O. Box 2749
West Helena, AR 72390

Dear Joe:

The Department has received and reviewed your submission of April 27, 1988, concerning the sampling and analysis of the surface impoundments.

There are several irregularities in the analytical results and the QA/QC portions of the report which prohibit the Department from approving the data.

Please let me know a date and time which would be convenient for you to discuss this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen Deere".

Karen Deere
Enforcement Branch Manager
Hazardous Waste Division

KD:fw:ltrl10

cc: Dick Cassat, ADPC&E

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

May 6, 1988

Mr. Joe Porter
Environmental Engineer
Cedar Chemical Corp.
P. O. Box 2749
West Helena, AR 72390

CSN: 540068 Permit No.
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

RE: Cedar Chemical Corp.
Final Closure
Tank and Container Storage

Dear Mr. Porter:

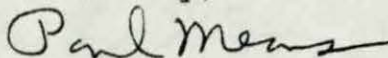
The notice of intent to approve the closure plans of Hazardous Waste Management Units at Cedar Chemical Corp. at West Helena, Arkansas was published in the Helena-West Helena World on March 30, 1988. The required thirty (30) day comment period has ended; and as of the date of this letter, no comments have been received.

In consideration of the above facts, the Department hereby approves the modified closure plan for tank units at this facility. Cedar Chemical Corp. shall implement closure as specified by the schedule in the approved closure plan.

As per your letter dated April 27, 1988, regarding the required analytical requirements for volatiles and semi-volatiles, Cedar Chemical will be held responsible to test for only those compounds which have been handled on the plant site. The list of parameters for analysis which were listed in the letter is deemed complete.

Cedar Chemical Corp. shall be responsible for continued compliance with all applicable interim status regulations until final closure is complete and certified, and the Department has released the financial assurance mechanisms in accordance with 40 CFR.143 (h), as adopted by reference in Section 3 of the Arkansas Hazardous Waste Code.

Sincerely,


Paul Means
Director

DW/ckh:LTR107

cc: Mike Bates, Hazardous Waste Division
Gary Martin, Hazardous Waste Division
Becky Keogh, Hazardous Waste Division
D. G. Warrick, Hazardous Waste Division

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

CERTIFIED MAIL

May 3, 1988

Mr. Joe Porter
Environmental Engineer
Cedar Chemical Corporation
P. O. Box 27229
West Helena, AR 72390

CSN: 540068 Permit No.
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

Dear Joe:

The Department has received and reviewed your letter of April 26, 1988, concerning the proposal for hydrogeologic study prepared by Grubbs, Garner and Haskyn, Inc.

The proposed scope of work appears to satisfy the requirements for a general site study. However, there were facility specific requirements in the Department's letter of December 2, 1987, which must be performed and information supplied before the hydrogeologic report can be approved. Please make sure that G.G.&H. is aware of the facility specific requirements before initiation of the work.

The implementation schedule calls for submission of the final report to the Department no later than one hundred seven (107) days after receipt of this letter.

If you have any questions, please feel free to call .

Sincerely,

Karen Deere

Karen Deere
Manager, Enforcement Branch
Hazardous Waste Division

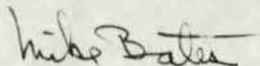
KD/ckh:LTR106

cc: Mark Simpson
Legal File

6. The soils shall be analyzed for arsenic, cyanide, volatiles (EPA 8240), semi-volatiles (EPA 8250), and pH parameters. Clean closure criteria for all constituents must adhere to "non-detectable" based on the specific analytical method used.

This action is proposed by the Department pending public notice and consideration of comments received during the required public comment period of thirty (30) days. Thereafter, the items required by modification number 4 above must be submitted within fifteen (15) days of final approval by the Department of the closure plan and prior to implementation. A copy of the public notice is enclosed which will be published in the Helena-West Helena World, on March 30, 1988.

Sincerely,



Mike Bates
Chief
Hazardous Waste Division

DW/ckh:LTR21

Enclosure

cc: D. Warrick, ADPC&E
Gary Martin, ADPC&E
Karen Deere, ADPC&E

NOTICE OF CLOSURE PLAN

Pursuant to the Provisions of the Arkansas Hazardous Waste Management Act (Act 406 of 1979, as amended) and related Federal and State laws and regulations, the Arkansas Department of Pollution Control and Ecology is issuing a notice of intent to approve the Closure Plan of Hazardous Waste Management Units at Cedar Chemical Corp. in West Helena, Arkansas. The closure of the tank and container storage units will constitute final closure of all regulated hazardous waste management units at the facility.

Cedar Chemical Corp. previously submitted closure plans for an above ground tank and a container storage unit. The Department, pursuant to its authority under Act 406 and the Arkansas Hazardous Waste Management Code, is proposing to approve the submitted plans with modifications.

Persons desiring to comment on the closure plan may write or visit the Department of Pollution Control and Ecology, 8001 National Drive, P. O. Box 9583, Little Rock, Arkansas 72219. Copies of the Closure Plan as proposed to be modified will be available for public review at the Department Central File Room in Little Rock, Arkansas. Comments must be received by 5:00 p.m. April 29, 1988.

Dated this 30th day of March, 1988.

Paul Means
Director, ADPC&E



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

March 24, 1988

*Cedar Chemical Corp.
HWMU Closure Plans*

The Daily World
P.O. Box 340
Helena, AR 72342

ATTENTION LEGAL AD DEPARTMENT:

Please publish the attached legal notice in the Daily World Wednesday, March 30, 1988, and that date only. Send the proof of publication and three copies of the bill to: Fiscal Officer, Department of Pollution Control and Ecology, P.O. Box 9583, Little Rock, AR 72219.

If you have any questions, please call me or Richard Merritt at the telephone number above.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Szenher".

Doug Szenher
Communications Coordinator

attachment

NOTICE OF CLOSURE PLAN

Pursuant to the Provisions of the Arkansas Hazardous Waste Management Act (Act 406 of 1979, as amended) and related Federal and State laws and regulations, the Arkansas Department of Pollution Control and Ecology is issuing a notice of intent to approve the Closure Plan of Hazardous Waste Management Units at Cedar Chemical Corp. in West Helena, Arkansas. The closure of the tank and container storage units will constitute final closure of all regulated hazardous waste management units at the facility.

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Dated this 30th day of March, 1988.

Paul Means
Director, ADPC&E



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

March 24, 1988

Mr. Joe E. Porter
Environmental Engineer
Cedar Chemical Corp.
P. O. Box 2749
West Helena, AR 72390

CSN: 547068 Permit No.
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

RE: Cedar Chemical Corp. - West Helena, Arkansas
Tank and Container Storage Closure Plans

Dear Mr. Porter:

We have reviewed your final closure plan dated February 19, 1988 for hazardous waste storage facilities located at West Helena, Arkansas.

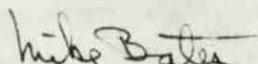
We are proposing to approve the final closure plans subject to the following modification requirements:

1. The soil samples required for closure of the container storage area and the storage tank area shall be taken no further than one (1) foot away from the paved area and no further than ten (10) feet apart.
2. After excavation of any contaminated soils, the surrounding soil and bottom of excavation shall be resampled and analyzed for the constituents and criteria required for clean closure. Sample frequency shall be one (1) sample for every twenty-five (25) square feet of sub-surface soil uncovered.
3. Upon determination by Cedar Chemical Corp. that clean closure cannot feasibly be accomplished, immediate notification shall be given to this Department. The closure plan shall then be amended in accordance with 40 CFR 265.112(c).
4. Cedar Chemical shall submit a map which delineates the areas of the specific container storage area, the specific storage tank area and biological treatment system. The map shall also delineate each soil sample location and area specific drainage patterns. The map detail is subject to approval prior to sampling implementation by the facility.
5. The wastewater generated from the cleaning process of the container storage area shall be analyzed in accordance with EPA Analytical Method 8240 or 8020 (SW-846) for toluene.

6. The soils shall be analyzed for arsenic, cyanide, volatiles (EPA 8240), semi-volatiles (EPA 8250), and pH parameters. Clean closure criteria for all constituents must adhere to "non-detectable" based on the specific analytical method used.

This action is proposed by the Department pending public notice and consideration of comments received during the required public comment period of thirty (30) days. Thereafter, the items required by modification number 4 above must be submitted within fifteen (15) days of final approval by the Department of the closure plan and prior to implementation. A copy of the public notice is enclosed which will be published in the Helena-West Helena World, on March 30, 1988.

Sincerely,



Mike Bates
Chief
Hazardous Waste Division

DW/ckh:LTR21

Enclosure

cc: D. Warrick, ADPC&E
Gary Martin, ADPC&E
Karen Deere, ADPC&E

NOTICE OF CLOSURE PLAN

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Dated this 30th day of March, 1988.

Paul Means
Director, ADPC&E



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

March 14, 1988

Mr. Joe Porter
Environmental Engineer
Cedar Chemical Corporation
P. O. Box 2749
West Helena, Arkansas 72390

CSN: 540068 Permit No.
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

RE: Consent Administrative Order

Dear Joe:

We have reviewed your modified hydro-geologic investigation plan dated January 25, 1988 in conjunction with your letter dated January 4, 1988. The Department is hereby approving the investigation pursuant to the following conditions:

1. Submission of an implementation schedule for the investigation within fifteen (15) days of receipt of this letter.
2. An explanation of plant north versus true north should be shown on all site drawings submitted.
3. All the work outlined in the January 4 letter is completed and documented in the final report.
4. Regional information is provided to document the conclusion that the bottom of the upper most aquifer is not deeper than 100 feet below the surface.

If you have any questions in this matter please feel free to call.

Sincerely,

Karen Deere
Manager, Enforcement Branch
Hazardous Waste Division

KD/ckh:LTR3

cc: Legal file
Jim Rigg

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME

CEDAR Chemical Corporation
WEST HELENA, AR 72390

EPA ID NO.

ARD 990660649 ✓



FORM

IC

U.S. ENVIRONMENTAL
PROTECTION AGENCY

1987 Hazardous Waste Report

MAR 02 1988

IDENTIFICATION AND
CERTIFICATION

WHO MUST COMPLETE THIS FORM?

Form IC must be completed by every site that received this package.

INSTRUCTIONS:

Please read the detailed instructions beginning on page 4 of the 1987 Hazardous Waste Report Instruction booklet before completing this form.

Complete Sections I through IV and Sections VI through IX immediately. Complete Section V, certification, after you have finished the full report package.

SEC. I.

Site name and physical location which may differ from the mailing address. Complete items A through G.

Mark ☒ for items A, B, C, D, F, and G if same as label; if different, enter corrections. If label is absent, enter information.

A. Site/company name

Same as label ☒

CEDAR Chemical Corporation

B. EPA ID No.

Same as label ☒

ARD 990660649

C. Address number and street name of physical location - if not known, enter industrial park, building name or other physical location description

Same as label ☐

or — Hwy 242 South

D. City, town, village, etc.

Same as label ☒

WEST HELENA

E. County

Phillips

F. State

Same as label ☒

or — AR

G. Zip Code

Same as label ☒

or — 72390

SEC. II.

Mailing address of site.

Mark ☒ for A, B, C, and D if same as label; if different, enter corrections.

A. Number and street name of mailing address

Same as label ☐

or — P.O. Box 2749

B. City, town, village, etc.

Same as label ☒

WEST HELENA

C. State

Same as label ☒

or — AR

D. Zip Code

Same as label ☒

or — 72390

SEC. III.

Name, title, and telephone number of the person who should be contacted if questions arise regarding this report.

A. Please print: Last name

First name

M.I.

B. Title

C. Telephone

PORTER

JOE

E.

Environmental
Engineer

501 572 3701
Extension

SEC. IV.

Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. SIC codes are listed beginning on page 1 of the 1987 Hazardous Waste Report Codebook.

A.

2869

B.

2879

C.

D.

E.

F.

SEC. V.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Please print: Last name

First name

M.I.

Title

John H. Mites

Plant Manager

B. Signature

Date of signature

02 29 88
Mo. Day Yr.

Page 1 of 6

SEC.
VI.

Does this site's EPA ID authorize hazardous waste generation?

MAR 02 1988

- ☐ NO — SKIP TO SECTION VII.
- ☒ YES — Did this site generate any hazardous waste during 1987?
- ☒ YES — READ DETAILED INSTRUCTION ON PAGE 5 OF THE 1987 HAZARDOUS WASTE REPORT INSTRUCTIONS BOOKLET FOR ACUTE AND ACCUMULATION LIMITS. MARK ☒ NEXT TO THE HAZARDOUS WASTE GENERATION QUANTITY CATEGORY THAT APPLIED TO THIS SITE DURING 1987.
- ☒ Category 1: More than 1000 kg (2,200 lb) in one or more months
- ☐ Category 2: More than 100 kg (220 lb) but no more than 1000 kg (2,200 lb) in any single month
- ☐ Category 3: No more than 100 kg (220 lb) in any single month
- ☐ Mark ☒ if this site changed from Category 1 to Category 2 or 3 due to waste minimization activity conducted during 1986 or 1987.
- ☐ NO — CONTINUE BELOW, MARK ☒ NEXT TO ALL THAT APPLY.
- ☐ Generated, excluded or delisted wastes
- ☐ Generated hazardous waste prior to 1987 but do not expect to generate in the future - MARK ☒ FOR REASON IN ONE BOX BELOW
- ☐ Waste was from one-time event(s) (e.g. spills, remedial actions, etc.)
- ☐ Waste minimization activity undertaken during 1986 or 1987
- ☐ Out of business
- ☐ Generated hazardous waste prior to 1987 and expect to generate in the future
- ☐ Never generated before but expect to generate in the future
- ☐ Never generated and do not expect to generate in the future - MARK ☒ FOR REASON IN ONE BOX BELOW
- ☐ Protective notifier only
- ☐ Misunderstood the requirements
- ☐ Notified to secure transportation services
- ☐ Other EXPLAIN REASON FOR GENERATOR NOTIFICATION IN COMMENTS

SEC.
VII.

Does this site have RCRA Interim Status or a RCRA permit to treat, store, or dispose hazardous waste?

- ☐ NO — SKIP TO SECTION VIII
- ☒ YES — Did the site treat, store, or dispose (T/S/D) hazardous waste in RCRA-regulated units during 1987?
- ☒ YES — SKIP TO SECTION VIII
- ☐ NO — CONTINUE BELOW, MARK ☒ NEXT TO ALL THAT APPLY
- ☐ T/S/D excluded waste during 1987
- ☐ T/S/D hazardous waste in exempt units during 1987
- ☐ T/S/D hazardous waste prior to 1987 but did not T/S/D waste during 1987. MARK ☒ IN ONE BOX BELOW
- ☐ T/S/D will resume in the future
- ☐ Have notified of planned closure
- ☐ Site is in closure or post closure
- ☐ Never T/S/D hazardous waste prior to 1987 but: MARK ☒ IN ONE BOX BELOW
- ☐ Expect to T/S/D hazardous waste in the future
- ☐ Do not expect to T/S/D hazardous waste in the future - EXPLAIN REASON FOR INTERIM STATUS OR PERMIT IN COMMENTS

SEC.
VIII.

Do you wish to withdraw this site's generator notification or EPA Part A permit application?

- Withdraw generator notification ☐ Yes ☒ No
- Withdraw Part A permit application ☐ Yes ☒ No

SEC.
IX.

Does this site have an area not requiring a RCRA Part A or Part B permit that is used exclusively for the short term accumulation of hazardous waste?

- ☐ NO
- ☒ YES — DOES THE AREA HAVE:
- Containers ☐ No ☒ Yes
- Tanks ☐ No ☒ Yes
- ENTER THE NUMBER OF TANKS AND THEIR TOTAL CAPACITY IN GALLONS.
- ☒ Yes — Number Gallon capacity

Comments:

1987 HAZARDOUS WASTE REPORT

FORM GE: GENERATOR ACTIVITY REPORT

MAR 02 1988

SECTION I: GENERATOR ID: A.R.D. 99.0.6.6.0.6.4.9.
[] MARK (X) IF NOT REQUIREDOFFICIAL USE ONLY: DATE RECEIVED
DATE ENTERED: BY:SECTION II: A. EPA IDENTIFICATION NUMBER L.A.D. 0.0.0.7.7.8.5.1.4.FACILITY
IDENTIFICATIONB. NAME Rollins Environmental Services of Louisiana, Inc
ADDRESS RT 2 Box 1200 - GRACIE LANE - Bayou Sorrel
CITY: PLAQUEMINE STATE LA ZIP 70764

SECTION III:

A. T.X.D. 9.8.1.1.4.8.8.8.5.
EPA IDENTIFICATION NUMBERB. H- 0.3.0.6. * PC- 0.9.9.6.
ARKANSAS TRANSPORTATION PERMIT NO.TRANSPORTER
IDENTIFICATIONC. NAME Service Lines, Inc 214-938-6048
ADDRESS 4301 BRIDLE PATH
CITY: MARSHALL STATE TX ZIP 75670SECTION IV: TOTAL WASTE
GENERATED

AMOUNT

WGM

(COMPLETE THIS SECTION ONLY
ONCE FOR YOUR FACILITY)A. TOTAL HAZARDOUS WASTE GENERATED IN PREVIOUS YEAR (1986)
B. TOTAL HAZARDOUS WASTE GENERATED IN REPORTING YEAR (1987)
C. TOTAL HAZARDOUS WASTE ON-SITE AT BEGIN OF REPORTING YEAR
D. TOTAL HAZARDOUS WASTE ON-SITE AT END OF REPORTING YEAR

SECTION V: WASTE IDENTIFICATION

LINE NO.	A. WASTE DESCRIPTION	B. DOT HAZARDOUS CODE	C. EPA HAZARDOUS WASTE NUMBER	D. AMOUNT OF WASTE	E. WGM	F. DENSITY
01	WASTE, Liquid, NOS, NON HAZARDOUS WASTE NITRATION Aqueous Waste RP15	—	—	1,067,840	P	—
02	WASTE, Corrosive Liquid, NOS RP10	0.2	D002	653,660	P	—
03	WASTE, HAZARDOUS Substance, Liquid, NOS, ORME, RQ-Dinitro-o-cresol NA 9188	1.5	—	707,320	P	—
04	HAZARDOUS Waste, Liquid, NOS, ORME D003, NA 9189	1.5	D003	410,700	P	—
05	HAZARDOUS Waste, Liquid, NOS, ORME D003, NA 9189	1.5	D003	575,960	P	—
06						
07						

SECTION VI: COMMENTS

Line No. 1 → Non-hazardous waste. Not acceptable to biological treatment.

1987 HAZARDOUS WASTE REPORT

FORM GE: GENERATOR ACTIVITY REPORT

SECTION I: GENERATOR ID: A.R.D. 9,9,0,6,6,0,6,4,9
 () MARK (X) IF NOT REQUIRED

OFFICIAL USE ONLY: DATE RECEIVED MAR 02 1988
 DATE ENTERED: BY:

SECTION II: A. EPA IDENTIFICATION NUMBER L.A.D. 91,0,3,9,5,1,2,7

FACILITY
IDENTIFICATION

B. NAME Rollins Environmental Services of Louisiana, Inc.
 ADDRESS PO Box 74137 - 13351 SCENIC Highway
 CITY: Baton Rouge STATE LA ZIP 70807

SECTION III: A. L.A.D. 9,8,1,0,5,9,0,1,7
 EPA IDENTIFICATION NUMBER

B. H- 0,1,0,4 ; PC- 0,9,8,8
 ARKANSAS TRANSPORTATION PERMIT NO.

TRANSPORTER
IDENTIFICATION

C. NAME Custom Environmental Transport Service
 ADDRESS PO Box 2349
 CITY: Wilmington STATE DE ZIP 19899

SECTION IV: TOTAL WASTE
GENERATED

A. TOTAL HAZARDOUS WASTE GENERATED IN PREVIOUS YEAR (1986)
 B. TOTAL HAZARDOUS WASTE GENERATED IN REPORTING YEAR (1987)
 C. TOTAL HAZARDOUS WASTE ON-SITE AT BEGIN OF REPORTING YEAR
 D. TOTAL HAZARDOUS WASTE ON-SITE AT END OF REPORTING YEAR

AMOUNT VOLUME

SECTION V: WASTE IDENTIFICATION

LINE NO	A. WASTE DESCRIPTION	B. DOT HAZARDOUS CODE	C. EPA HAZARDOUS WASTE NUMBER	D. AMOUNT OF WASTE	E. VOLUME	F. DENSITY
01	HAZARDOUS WASTE, Solid, NOS, ORME NA 9189, D001	1.5	D001	30,220	P	
02	WASTE Flammable Liquid, NOS, UN 1993 D001	0.8	D001	4000	P	
03						
04						
05						
06						
07						

SECTION VI: COMMENTS

ENTD APR 6 1988

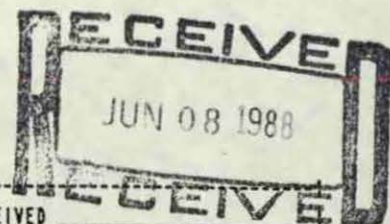
Item 2

34,220 lbs : Dool

to Rollins in Baton Rouge

Leak up
Rollins & PAH
etc.

1987 HAZARDOUS WASTE REPORT
FORM GE: GENERATOR ACTIVITY REPORT



SECTION I: GENERATOR ID: ARD 990660649 : OFFICIAL USE ONLY: DATE RECEIVED _____
[] MARK [X] IF NOT REQUIRED : DATE ENTERED: _____ BY: _____

SECTION II: A. EPA IDENTIFICATION NUMBER TXD000742304
FACILITY IDENTIFICATION B. NAME Gibraltar Chemical Resources, Inc. 214-877-3227
ADDRESS PO Box 248 - Hwy 155
CITY: Winona STATE TX ZIP 75792

SECTION III: A. TXD000742304 : B. H-0116 : PC-0815
EPA IDENTIFICATION NUMBER : ARKANSAS TRANSPORTATION PERMIT NO.
TRANSPORTER IDENTIFICATION C. NAME Gibraltar Chemical Resources, Inc. 214-877-3227
ADDRESS PO Box 248 - Hwy 155
CITY: Winona STATE TX ZIP 75792

SECTION IV: TOTAL WASTE GENERATED		AMOUNT	WQW
(COMPLETE THIS SECTION ONLY ONCE FOR YOUR FACILITY)	A. TOTAL HAZARDOUS WASTE GENERATED IN PREVIOUS YEAR (1986)	<u>33,755,970</u>	<u>P</u>
	B. TOTAL HAZARDOUS WASTE GENERATED IN REPORTING YEAR (1987)	<u>29,869,150</u>	<u>P</u>
	C. TOTAL HAZARDOUS WASTE ON-SITE AT BEGIN OF REPORTING YEAR	<u>7600 11,600</u>	<u>P</u>
	D. TOTAL HAZARDOUS WASTE ON-SITE AT END OF REPORTING YEAR	<u>7600</u>	<u>P</u>

SECTION V: WASTE IDENTIFICATION

LINE NO.	A. WASTE DESCRIPTION	B. DOT HAZARDOUS CODE	C. EPA HAZARDOUS WASTE NUMBER	D. AMOUNT OF WASTE	E. WQW	F. DENSITY
01	WASTE, FLAMMABLE Liquid, NOS UN1993 RQ Toluene - D001 H40/H48	<u>08</u>	<u>D001</u>	<u>28,198,610</u>	<u>P</u>	
02						
03						
04						
05						
06						
07						

SECTION VI: COMMENTS Additional Transporters

Service Lines, Inc - TXD 981 148 885 / H306 / PC996
4307 Bridle Path - Marshall, TX 75670 214-938-6048
Lee's Trucking Service - ARD 981 513 385 / H335 / PC1024
Route 6 Box 5 - El Dorado, AR 71730 501-862-5477

Item 4

Revised Page 3 of 6 : Form GE

1987 HAZARDOUS WASTE REPORT
FORM GE: GENERATOR ACTIVITY REPORT

MAR 02 1988

SECTION I: GENERATOR ID: A.R.D. 9.9.0.6.6.0.6.4.9 : OFFICIAL USE ONLY: DATE RECEIVED _____
[] MARK [X] IF NOT REQUIRED : DATE ENTERED: _____ BY: _____

SECTION II: A. EPA IDENTIFICATION NUMBER TX: D: 0: 0: 0: 7: 4: 2: 3: 0: 4:
FACILITY IDENTIFICATION B. NAME Gibraltar Chemical Resources, Inc. 214-877-3227
ADDRESS PO Box 248 - Hwy 155
CITY: WINONA STATE TX ZIP 75792

SECTION III: A. TX: D: 0: 0: 0: 7: 4: 2: 3: 0: 4: B. H- 0: 1: 1: 6: * PC- 0: 8: 1: 5:
TRANSPORTER IDENTIFICATION EPA IDENTIFICATION NUMBER ARKANSAS TRANSPORTATION PERMIT NO.
C. NAME Gibraltar Chemical Resources, Inc. 214-877-3227
ADDRESS PO Box 248 - Hwy 155
CITY: WINONA STATE TX ZIP 75792

SECTION IV: TOTAL WASTE GENERATED	AMOUNT	WOM
(COMPLETE THIS SECTION ONLY ONCE FOR YOUR FACILITY)		
A. TOTAL HAZARDOUS WASTE GENERATED IN PREVIOUS YEAR (1986)		
B. TOTAL HAZARDOUS WASTE GENERATED IN REPORTING YEAR (1987)		
C. TOTAL HAZARDOUS WASTE ON-SITE AT BEGIN OF REPORTING YEAR		
D. TOTAL HAZARDOUS WASTE ON-SITE AT END OF REPORTING YEAR		

SECTION V: WASTE IDENTIFICATION

LINE NO.	A. WASTE DESCRIPTION	B. DOT HAZARDOUS CODE	C. EPA HAZARDOUS WASTE NUMBER	D. AMOUNT OF WASTE	E. WOM	F. DENSITY
01	WASTE, FLAMMABLE Liquid, NOS UN1993 RQ Toluene - D001 H40/H48	0: 8	D001	28,198,610	P	
02						
03						
04						
05						
06						
07						

END APR 6 1988

SECTION VI: COMMENTS Additional Transporters

Service Lines, Inc - TX D 981 148 885 / H306 / PC996
4307 Bridle Path - Marshall, TX 75670 214-938-6048
Lee's Trucking Service - ARD 981 513 385 / H335 / PC1024
Route 6 Box 5 - El Dorado, AR 71730 501-862-5477

Item 1 A

1987

Code D003

Total: 986,660

A

Item 1 B

1987

DOOZ Code

Total : 653,660 lbs

B

1987 HAZARDOUS WASTE REPORT
FORM FR: FACILITY ACTIVITY REPORT

RECEIVED
MAR 02 1993

SECTION I: FACILITY ID: ARD 990660649 : OFFICIAL USE ONLY: DATE RECEIVED MAR 02 1993
 : MARK [X] IF NOT REQUIRED : DATE ENTERED: _____ BY _____

SECTION II: COST ESTIMATES FOR FACILITIES : A. FACILITY CLOSURE \$ 27,000
 : B. POST CLOSURE MONITORING & MAINTENANCE \$ _____

SECTION III: TOTAL WASTE IN STORAGE : (Amount of Waste) (UOM) : (Amount of Waste) (UOM)
 ON DECEMBER 31, 1987 : S01 7600 P : S02 _____
 (Complete this section only once : S03 _____ : S04 _____
 for your facility) : S05 _____

SECTION IV: GENERATOR IDENTIFICATION
 : ON-SITE GENERATED
 : NAME: _____
 : ADDRESS: _____
 EPA IDENTIFICATION NUMBER : CITY: _____ STATE _____ ZIP _____

SECTION V: WASTE IDENTIFICATION AND MANAGEMENT:

LINE NO	A. WASTE DESCRIPTION	B. EPA HAZARDOUS WASTE NUMBER	C. METHOD HANDLED	D. AMOUNT OF WASTE	E. UOM	F. DENSITY
01		<u>X</u>				
02		<u>X</u>				
03		<u>X</u>				
04		<u>X</u>				
05		<u>X</u>				
06		<u>X</u>				
07		<u>X</u>				
08		<u>X</u>				

SECTION VI: COMMENTS

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME

CEDAR Chemical Corporation

WEST HELENA, AR 72390

EPA ID NO.

ARD,99,0,6,6,0,6,4,9



FORM
WM

U.S. ENVIRONMENTAL
PROTECTION AGENCY

1987 Hazardous Waste Report

MAR 02 1988
WASTE MINIMIZATION

PART I

WHO MUST COMPLETE THIS FORM?

Form WM Part I, describing efforts undertaken to implement waste minimization programs, must be completed by all generators required to file an Annual/Biennial Report. This requirement was established in response to statutory provisions included in the Hazardous and Solid Waste Amendments of 1984 (HSWA).

NOTE: Generators shipping hazardous waste off site are required to certify, on Item 16 of the Uniform Hazardous Waste Manifest, that they have a program in place to reduce, to the degree determined economically practicable, the volume and toxicity of hazardous waste generated. A similar certification must also be made by generators who have obtained a RCRA treatment, storage, or disposal permit. Consistent with these certification requirements, generators must report, on Form WM Part I, the efforts undertaken to implement waste minimization programs.

INSTRUCTIONS:

Please read the detailed instructions on page 8 of the 1987 Hazardous Waste Report Instruction booklet before completing this form.

Answer questions 1 through 10. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

1. Did this site create or expand a source reduction and recycling program?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Create	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Expand	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2. Did this site have a written policy or statement that outlined goals, objectives and methods for source reduction and recycling of hazardous waste?

	1987	1986	Prior Years
Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
No	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENTD APR 6 1988

3. What was the dollar amount of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste? ENTER ZERO (0) IF NONE.

	1987	1986	Prior Years
Capital expenditures	\$ <u>DK</u>	\$ <u>DK</u>	\$ <u>DK</u>
Operating costs	\$ <u>DK</u>	\$ <u>DK</u>	\$ <u>DK</u>

4. Did this site have an employee training program or provide incentives (bonuses, awards, personal recognition, etc.) to identify and implement source reduction and recycling opportunities and activities?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Training	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Incentives	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

MAR 02 1993

5. Did this site conduct a source reduction and/or recycling opportunity assessment or audit? Note: an opportunity assessment or audit is a procedure that identifies practices that can be implemented to reduce the generation of hazardous waste or the quantity which must subsequently be treated, stored or disposed.

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Site-Wide	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Process-Specific	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6. Did this site identify or implement new SOURCE REDUCTION opportunities to reduce the volume and/or toxicity of hazardous waste generated at this site?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Identify	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Implement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7. What factors have delayed or prevented implementation of SOURCE REDUCTION opportunities. MARK ☒ NEXT TO ALL THAT APPLY.

- ☐ a. Insufficient capital to install new source reduction equipment or implement new source reduction practices.
- ☐ b. Lack of technical information on source reduction techniques, applicable to my specific production processes.
- ☒ c. Source reduction is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- ☒ d. Concern that product quality may decline as a result of source reduction.
- ☒ e. Technical limitations of the production processes.
- ☐ f. Permitting burdens.
- ☐ g. Other (SPECIFY) _____

8. Did this site identify or implement new RECYCLING opportunities to reduce the volume and/or toxicity of hazardous waste generated at this site or subsequently treated, stored, or disposed of on site or off site?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Identify	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Implement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

9. What factors have delayed or prevented implementation of on-site or off-site RECYCLING opportunities. MARK ☒ NEXT TO ALL THAT APPLY.

- ☒ a. Insufficient capital to install new recycling equipment or implement new recycling practices.
- ☒ b. Lack of technical information on recycling techniques applicable to this site's specific production processes.
- ☒ c. Recycling is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- ☒ d. Concern that product quality may decline as a result of recycling.
- ☐ e. Requirements to manifest wastes inhibit shipments off site for recycling.
- ☐ f. Financial liability provisions inhibit shipments off site for recycling.
- ☐ g. Technical limitations of product processes inhibit shipments off site for recycling.
- ☒ h. Technical limitations of production processes inhibit on-site recycling.
- ☐ i. Permitting burdens inhibit recycling.
- ☐ j. Lack of permitted off-site recycling facilities.
- ☐ k. Unable to identify a market for recyclable materials.
- ☐ l. Other (SPECIFY) _____

10. Has this site requested or received technical information or financial assistance on source reduction and/or recycling practices from any of the following sources? MARK ☒ NEXT TO ALL THAT APPLY.

	1987		1986		Prior Years	
	Technical	Financial	Technical	Financial	Technical	Financial
a. Local government	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. State government	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Federal government	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Trade associations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Educational institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Suppliers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Other parts of your firm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Other firms/consultants	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. No request made	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Other (conferences, literature, etc.) _____	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME

CEDAR Chemical Corporation

WEST HELENA, AR 72390

EPA ID NO.

AR0990660649



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1987 Hazardous Waste Report

MAR 02 1988

WASTE MINIMIZATION

PART II

FORM
WM

WHO MUST COMPLETE THIS FORM?

Form WM Part II must be completed only by generators that engaged in an activity during 1987 that resulted in waste minimization.

Waste minimization means:

- (1) reduction in the volume and/or toxicity of hazardous waste generated as a result of source reduction; and/or,
- (2) reduction in the volume and/or toxicity of hazardous waste subsequently treated, stored, or disposed as a result of on-site or off-site recycling.

☐

Mark ☒ and do not complete this form if no waste minimization results were achieved during 1987.

INSTRUCTIONS:

Please read the detailed instructions on page 10 of the 1987 Hazardous Waste Report Instruction booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste minimized in 1987.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I	A. EPA hazardous waste code Instruction Page 11 D, 0, 0, 1	B. State hazardous waste code Page 11 NA	C. Product or service description Page 11 Manufacture of synthetic pyrethroid insecticide (technical) Permethrin	D. Product or service SIC code Page 11 2, 8, 7, 9
E. Waste form code Page 11 14, 4, 8	F. UOM Page 12 P	G. Density Page 12 lbs/gal	H. Source description: Page 12 Process wastewater	I. Source code Page 12 1, 0

ENTD APR 10 1988

Sec. II	A. 1988 quantity generated Instruction Page 13 7, 2, 8, 1, 4, 3, 0	B. 1987 quantity generated Page 13 7, 8, 3, 5, 9, 8, 0	C. Production ratio Page 13 1, 1, 5	D. Toxicity change code Page 15 2
E. Waste minimization: recycling Page 15 Code 1. 0 2. 0 Quantity recycled NA	F. Waste minimization: source reduction Page 16 Code 1. 1 2. 2 3. 5 Quantity prevented 5, 3, 7, 6, 6, 4			

Sec. III	A. Narrative description of waste minimization project or activity and results achieved Instruction Page 23
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Sec. IV. **Instructions:** Answer questions 1 through 4. Mark ☒ next to the effects produced by the source reduction and/or recycling activity reported on this form in Sections I through III.

MAR 02 1988

1. What effect did this site's source reduction and/or recycling activity have on the **quantity of water effluent** produced by hazardous waste generation processes during 1987?
- ☒ a. Increase in the quantity of water effluent
- ☐ b. Decrease in the quantity of water effluent
- ☐ c. No effect on the quantity of water effluent
- ☐ d. Don't know
2. What effect did this site's source reduction and/or recycling activity have on the **toxicity of water effluent** produced by hazardous waste generation processes during 1987?
- ☐ a. Increase in the concentration of hazardous constituents
- ☒ b. Decrease in the concentration of hazardous constituents
- ☐ c. No effect on the concentration of hazardous constituents
- ☐ d. Don't know
3. What effect did this site's source reduction and/or recycling activity have on the **quantity of air emissions** produced by hazardous waste generation processes during 1987?
- ☐ a. Increase in the quantity of air emissions
- ☒ b. Decrease in the quantity of air emissions
- ☐ c. No effect on the quantity of air emissions
- ☐ d. Don't know
4. What effect did this site's source reduction and/or recycling activity have on the **toxicity of the air emissions** produced by hazardous waste generation processes during 1987?
- ☐ a. Increase in the concentration of hazardous constituents
- ☒ b. Decrease in the concentration of hazardous constituents
- ☐ c. No effect on the concentration of hazardous constituents
- ☐ d. Don't know

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME

CEDAR Chemical Corporation

West Helena, AR 72390

EPA ID NO.

AR0990660649



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1987 Hazardous Waste Report

MAR 02 1988
WASTE MINIMIZATION

PART II

FORM
WM

WHO MUST COMPLETE THIS FORM?

Form WM Part II must be completed only by generators that engaged in an activity during 1987 that resulted in waste minimization.

Waste minimization means:

- (1) reduction in the volume and/or toxicity of hazardous waste generated as a result of source reduction; and/or,
- (2) reduction in the volume and/or toxicity of hazardous waste subsequently treated, stored, or disposed as a result of on-site or off-site recycling.



Mark ☒ and do not complete this form if no waste minimization results were achieved during 1987.

INSTRUCTIONS:

Please read the detailed instructions on page 10 of the 1987 Hazardous Waste Report Instruction booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste minimized in 1987.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I	A. EPA hazardous waste code Instruction Page 11 <u>D001</u>	B. State hazardous waste code Page 11 <u>NA</u>	C. Product or service description Page 11 Manufacture of synthetic pyrethroid insecticide (technical) Cypermethrin	D. Product or service SIC code Page 11 <u>2879</u>
E. Waste form code Page 11 <u>H48</u>	F. UOM Page 12 <u>P</u>	G. Density Page 12 <u> </u> lbs/gal <u> </u> sg	H. Source description: Page 12 Process Wastewater	I. Source code Page 12 <u>10</u>

Sec. II	A. 1986 quantity generated Instruction Page 13 <u>27318500</u>	B. 1987 quantity generated Page 13 <u>20362630</u>	C. Production ratio Page 13 <u>0.66</u>	D. Toxicity change code Page 15 <u>2</u>
E. Waste minimization: recycling Page 15 Code 1. <u>0</u> 2. <u>0</u> Quantity recycled <u>NA</u>		F. Waste minimization: source reduction Page 16 Code 1. <u>1</u> 2. <u>2</u> 3. <u>5</u> Quantity prevented <u> </u>		

Sec. III	A. Narrative description of waste minimization project or activity and results achieved Instruction Page 23 Waste minimization efforts resulted in less hazardous components but greater volume.
----------	--

Sec.
IV.**Instructions:** Answer questions 1 through 4. Mark ☒ next to the effects produced by the source reduction and/or recycling activity reported on this form in Sections I through III.

1. What effect did this site's source reduction and/or recycling activity have on the **quantity of water effluent** produced by hazardous waste generation processes during 1987?
- ☒ a. Increase in the quantity of water effluent
- ☐ b. Decrease in the quantity of water effluent
- ☐ c. No effect on the quantity of water effluent
- ☐ d. Don't know
2. What effect did this site's source reduction and/or recycling activity have on the **toxicity of water effluent** produced by hazardous waste generation processes during 1987?
- ☐ a. Increase in the concentration of hazardous constituents
- ☒ b. Decrease in the concentration of hazardous constituents
- ☐ c. No effect on the concentration of hazardous constituents
- ☐ d. Don't know
3. What effect did this site's source reduction and/or recycling activity have on the **quantity of air emissions** produced by hazardous waste generation processes during 1987?
- ☐ a. Increase in the quantity of air emissions
- ☒ b. Decrease in the quantity of air emissions
- ☐ c. No effect on the quantity of air emissions
- ☐ d. Don't know
4. What effect did this site's source reduction and/or recycling activity have on the **toxicity of the air emissions** produced by hazardous waste generation processes during 1987?
- ☐ a. Increase in the concentration of hazardous constituents
- ☒ b. Decrease in the concentration of hazardous constituents
- ☐ c. No effect on the concentration of hazardous constituents
- ☐ d. Don't know

Comments:



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

May 18, 1988

ARD990660649
Joe E. Porter
Cedar Chemical Corporation
P.O. Box 2749
West Helena, AR 72390

RE: 1987 Hazardous Waste Report

Dear Mr. Porter:

After reviewing the 1987 hazardous waste report submitted for your location, the following discrepancies have been noted.

1. Page 4 lists 986,660 pounds of D003 waste and 653,660 pounds of D002 waste was shipped to Rollins Environmental Services, Plaquemine, LA. LAD000778514. Our manifest records lists 44,360 pounds of D001 and 298,660 pounds of D002 waste shipped to the facility. We have no manifest records of D003 waste being shipped from your location. Provide a list of manifests or copies to that facility. *Will send copies no D003*
2. Page 5 lists a total of 34,220 pounds of D001 waste shipped to Rollins Environmental Services, Baton Rouge LAD010395127. Our manifest records do not list any shipments to that facility. Provide copies of all manifests for this waste. *send copies of manifest*
3. Our manifest records lists 143,940 pounds of D002 waste to Chemical Waste Management Carlyss, LA, LAD00077201. Explain why this waste was not included in your report. *yes maybe 1986 waste shipped in 1987* *not Charles* *LN*
4. Page 3, Section IV has not been completed. This section must be completed once for your facility. Any waste that was generated in 1987 and remained on-site for less than 90 days, must be listed as a separate GE report.

Please provide an explanation for the above listed discrepancies to this Department within ten (10) working days of receipt of this letter. If you have any questions, please contact me.

Sincerely,

Vivian A. Lee
Vivian A. Lee
Administrative Assistant II
Hazardous Waste Division

VAL:fw:ltr1142

5/23
Mr. Porter will send copies of manifest
Item 3 does not pertain to that facility

CEDAR CHEMICAL CORPORATION

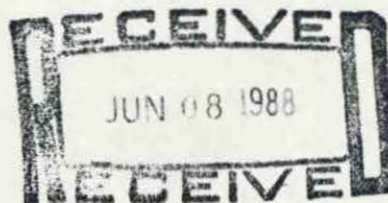
24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

June 2, 1988

Vivian A. Lee
Arkansas Department of Pollution Control & Ecology
P.O. Box 9583 - 8001 National Drive
Little Rock, Ar. 72209

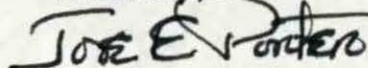
Re: 1987 Hazardous Waste Report



Dear Ms. Lee:

Attached are copies of manifests requested in your letter of May 18. Apparently both the Department and Cedar Chemical made some mistakes during the year. However, the totals are essentially correct. Through a clerical error we ceased sending the Department copies of Louisiana manifests. This has been corrected and we do not anticipate it will happen again.

Sincerely,



Joe E. Porter
Environmental Engineer

cc: J.H. Miles
B. Tucker

Item 3

Copies of manifest numbers: (Also included in Item 1B)

LA 37587

LA 37588

LA 37565



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI
ALLIED BANK TOWER AT FOUNTAIN PLACE
1445 ROSS AVENUE
DALLAS, TEXAS 75202

February 26, 1988

Mr. Mike Bates, Chief
Hazardous Waste Division
Arkansas Department of Pollution
Control and Ecology
P. O. Box 9583
Little Rock, Arkansas 72219

Dear Mr. Bates:

Enclosed you will find a copy of the following RCRA Facility
Assessment (RFA) report:

° Facility Name: Cedar Chemical Corp.

° EPA ID Number: ARD990660649

Additional information will be forwarded to you as it becomes
available. If you have any questions, please contact me or have your
staff contact Lydia Boada Clista at (214) 655-6790.

Sincerely yours,

Sam Becker, P.E.
Chief

Hazardous Waste Compliance Branch

Enclosure

#5
CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

Karen
FEB 25 1988

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

February 19, 1988

Karen Deere
Arkansas Department of Pollution Control & Ecology
P.O. Box 9583 - 8001 National Drive
Little Rock, Arkansas 72209

Re: West Helena Plant - Tank and Container Storage Area Closure

An amended closure plant is attached. Comments in your letter of January 15, 1988 have been addressed.

Upon closure, an assessment of the storage tank will be upgraded to meet the requirements of an accumulation tank prior to its reuse.

Sincerely,

Joe E. Porter

Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
A.T. Malone

General Closure Statements

The following is a written closure plan for tank storage facilities and container storage facilities located at Cedar Chemical Corporation, West Helena, Arkansas. The closure plan follows the guidelines and requirements set forth in CFR 40, Part 265 and adopted by reference in the Arkansas Hazardous Waste Management Code. This closure plan is notification that Cedar Chemical Corporation is ceasing to conduct regulated activities of tank storage and container storage. The facility will retain its' status as a hazardous waste generator with EPA ID Number ARD 990 660 649.

Closure Performance Standard. This partial closure plan was designed to ensure that the facilities used for storage will not require further maintenance and controls except as those required under generator status for an accumulation facility.

Subsequent to the closure of the one storage tank and the container storage area, Cedar Chemical will maintain Generator status. The storage tank will assume the classification of a 90 day accumulation tank. The container storage area will also be used as a 90 day accumulation area for containerized hazardous waste.

The facility currently has one (1) storage tank and a container storage area classified as Hazardous Waste Management Units. Each unit is addressed separately in the following plan. When the plan for each unit is complete, it will constitute final closure. Post-closure care is not a requirement of the closure plan.

In the most recent Part B submittal, three tanks were listed as being used for storage. By letter to the Department on October 1, 1987, we submitted documentation of two tanks being used for accumulation rather than storage. Accumulation tanks are not

currently required to meet the financial requirements of 40 CFR Subpart H.

As of January 27, 1988, there are twenty drums stored in the container storage area. The storage tank has been empty and clean since April 1987. Drums will be removed and transported to an appropriate disposal facility in the early stages of closure. The exact facility is dependent upon the particular waste. It is anticipated that most of the current inventory will be incinerated by Rollins Environmental Services of Baton Rouge. Once these drums are removed clean up procedures will be implemented.

This closure plan is for tanks and containers used for storage. The facility will continue to use tanks and containers for less than 90 day accumulation. Therefore this is a partial closure plan for the facility.

The storage tank is not currently in use. The container storage area contains twenty drums and there is no routine generation of containerized hazardous waste. Therefore closure procedures, including transportation, storage, and disposal, will not be interfered with while clean-up procedures are being implemented.

The maximum inventory for the closure sites is (1) assumed to be the capacity of the storage tank, 20,000 gallons and (2) the actual maximum inventory for the container storage area, 37, 820 pounds. Maximum facility inventory is calculated as the maximum inventory for the container storage area plus the maximum, combined volume of tanks used for storage and/or accumulation, 68,000 gallons.

A soil sampling program will be instituted to determine the extent of any soil contamination in the area. The storage tank is surrounded by concrete and asphalt on three sides. At least two soil samples will be taken from the remaining side. The

container storage will have three samples taken from each side. If contamination is found in the soil which has resulted from spills and/or leaks of stored material, these areas will be excavated to a depth at which no contamination from stored material is detected. All contaminated soils and contaminated equipment to be disposed will be loaded and transported by truck to an appropriate disposal facility.

An independent, qualified, registered professional engineer will be employed for inspections and certifications.

Tank Storage

Maximum inventory for tank T-B112 is assumed to be the capacity of the tank, 20,000 gallons. The tank served to manage a D002, corrosive, waste. The last shipment of this waste was made to Rollins Environmental Services, Baton Rouge, La., in March, 1987. A total of 43,000 gallons was removed from the tank in March 1987. Manifests and shipping records are available for documentation.

Description of Tank T-B112

Vertical Orientation: diameter: 12 feet
height: 24 feet

Carbon Steel Construction

Maximum Capacity: 20,300 gallons

Operating Maximum Level: 18,000 gallons

Sidewall and Bottom: 3/8 inch carbon steel

Top: 1/4 inch carbon steel

Manway for side entry: 18 inch

Caged ladder on side

Vents to scrubber system or to carbon drum with flame arrestor/conservation vent

Inert atmosphere maintained with Nitrogen as required

A cleaning plan has been developed which includes elementary

neutralization of any remaining tank contents and a thorough washing with copious volumes of water. After the neutralization wash and each rinse, the tank contents will be examined analytically for the parameter of pH. Elementary neutralization may be required to bring the pH into an acceptable range. When within the range of non-hazardous waste criteria, the wash will be discharged from the tank to the on-site biological treatment system.

Associated Equipment. All piping and the pump connected to the tank will be treated in the same way. The pump and piping will be used to circulate the tank contents when washing. No brushes, shovels, or other tools will be used to clean the tank. The tank will not be dismantled, removed, or otherwise disposed of. Therefore no other equipment requires decontamination.

Containment Area. The containment area consists of a concrete floor and surrounding concrete walls. The internal dike area will be washed using a detergent solution in a high pressure washer. Washwater will be tested analytically for the parameter of pH. When within the range of non-hazardous waste criteria, the wash will be discharged from the diked area to the on-site biological treatment system.

Sampling Procedures. Washes and rinsates of the tank and its surrounding concrete dike will be sampled as grab samples in glass containers. Samples will be hand-carried to the plant laboratory and analyzed. Analysis will take place within one hour of sampling. Results will then be immediately available. Samples will be taken from the tank and/or the tank dike immediately prior to removal of any wash or rinsate. No removal will be made until results have demonstrated that the wash or rinsate is non-hazardous.

Testing Parameters. Analytical criteria for decontamination will be the value of pH. The pH value of all washes or rinsates must

be in the range of pH 5 to pH 10 prior to removal and discharge to the biological treatment system.

Analytical Method. The parameter of pH will be determined in accordance with the analytical method outlined in "Test Methods for the evaluation of Solid Waste: Physical/Chemical Methods," SW-846., and "Standard Methods for the Examination of Water and Wastewater", 16th Edition.

Certification. The tank and its surrounding concrete dike will be visually inspected by the Environmental Engineer and a Professional Engineer registered in the State of Arkansas. Laboratory analysis will be examined by the Laboratory Manager, the Environmental Engineer and a Professional Engineer. Upon satisfaction of these parties that the tank is clean and does not contain hazardous waste, the Professional Engineer will provide written certification to the company. A copy of this certification will be included with notice to the State of Arkansas that the tank closure is complete within 60 days of completion of closure.

Subsequent to final closure, this tank will be placed back into service as a wastewater holding tank. Manifests, shipping records, and plant operating records will demonstrate that the tank will not be used for hazardous waste storage longer than 89 days.

Container Storage

The container storage area for hazardous waste in drums consists of a concrete slab with center drain and a collection sump. The concrete area is surrounded by an asphalt work area and is sheltered by an aluminum roof structure.

Current (Oct 12, 1987) inventory consists of ignitable (D001) and F005 (Toluene greater than 10%) hazardous waste. These will be removed within 90 days of plan implementation. Disposal will be off-site to a commercial incinerator facility.

Once the current inventory of hazardous waste is removed, the area will be cleaned using a detergent solution in a high pressure washer. Washwater will be tested analytically for the parameters of pH and flash point. When within the range of non-hazardous waste criteria, the wash will be discharged from the sump to the on-site biological treatment system.

Containment Area and Equipment. The asphalt area surrounding the concrete slab and the concrete sump will be cleaned in the same manner as the concrete area. If any shovels or brushes are used to facilitate cleaning, they will be washed before they leave the area. All washes will be tested for the parameters of pH and flash point. Washes will then be discharged to the biological treatment system.

Sampling Procedures. Washes and rinsates from the drum storage area will be sampled as grab samples in glass containers. Samples will be hand-carried to the plant laboratory for analysis. Discharges from the area will not be made prior to receipt of analytical results, demonstrating that washes are non-hazardous.

Testing Parameters. Analytical criteria for decontamination will be the value of pH and flash point. The pH value of all washes must be in the range of pH 5 to pH 10. All flash point values must be greater than 140 degrees F. These values will be documented prior to removal and discharge of washes to the biological treatment system. Wastewater generated in the cleaning process will also be analyzed for toluene due to its presence in the container storage area. Wastewater will only be discharged to the treatment if it meets the requirements set forth in 40 CFR paragraph 261.3.

Analytical Methods. Parameters of pH and flash point will be determined in accordance with analytical methods outlined in "Test Methods for the Evaluation of Solid Waste: Physical/Chemical Methods", SW-846.

Certification. The drum storage area will be visually inspected by the Environmental Engineer and a Professional Engineer registered in the State of Arkansas. Laboratory analysis will be examined by the Laboratory Manager, the Environmental Engineer, and a Professional Engineer. Upon satisfaction by those parties that the drum storage area is clean and does not contain hazardous waste, the Professional Engineer will provide written certification to the company. A copy of the certification will be included with notice to the State of Arkansas that the storage area closure is complete within 60 days of completion of closure.

After final closure of the drum storage area, the area will be used to manage containerized, hazardous waste with less than 90 days of storage. A containerized waste management program will document containers placed in the area. A monthly inventory will be conducted and manifests/shipping records will indicate movement and disposal.

Closure Schedule

Week 1	Planning & Schedule
Week 2	Soil Sampling/Analysis
Week 4	Tank Cleaning
	Tank Dike Cleaning
Week 5	Inventory Removal (off-site)
	Container Storage Area Cleaning
Week 6	Remediation (as required)
Week 10	Professional Engineer Inspection and Certification

Closure Cost Estimate

T-B112 Storage Tank

Tank Cleaning - 48 man hours @ \$25.00	\$1200.00
Tank Dike Cleaning - 40 man-hours @ 25.00	1000.00
Wash Neutralization and disposal (on-site)	1000.00
Third party supervision	1200.00
Laboratory Analysis	1000.00

Container Storage Area

Hazardous Waste Inventory disposal (off-site)	16000.00
Concrete slab and pump cleaning - 40 hours @ 25.00	1000.00
Third party supervision	900.00
Laboratory Analysis	1000.00

Certification

Professional Engineering Services	2500.00
-----------------------------------	---------

\$26,800.00

CSN: 540068 Permit No.
Media: Air, Water, Solid, ~~Hazardous~~
Sort: Permit, Compliance, Legat, Misc.
CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

Oct. 1, 1987

Karen Deere, Manager, Enforcement Branch
Arkansas Department of Pollution Control & Ecology
8001 National Drive - P.O. Box 9583
Little Rock, Ar. 72209

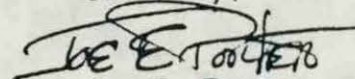
Dear Karen:

With reference to our meeting of September 23, we are submitting information for withdrawal of two tanks listed in our Part B application. The tanks are indicated by our Numbers T-PE209 and T-002. The tanks were originally designated as storage tanks under the RCRA definition of storage, however, the storage period has never exceeded 90 days.

The basis for this withdrawal is documented in the attached records. Given that the total tank volume is 27,000 gallons (243,000 pounds), manifest and shipping records indicate that the turnover rate has been much less than 90 days.

This withdrawal should simplify the impending closure plan. We appreciate your assistance and that of Becky Keogh in finalizing our plans.

Sincerely,


Joe E. Porter

cc: J.H. Miles
G.L. Pratt
A. Malone

Proposal

Page No. of Pages



CTC INDUSTRIAL SERVICES, INC.

P.O. BOX 1003

1827 LATHAM STREET

MEMPHIS, TENNESSEE 38101

(901) 942-1212

PROPOSAL SUBMITTED TO Cedar Chemical Co.	PHONE 501-572-3701	DATE February 19, 1988
CONTACT Joe Porter	JOB NAME Hydroblast Cleaning	
STREET P.O. Box 2749	JOB LOCATION	
CITY, STATE AND ZIP CODE West Helena, AR 72390		

We hereby submit specifications and estimates for

Hydroblasting the following items at you facility:

- 1). 20,000 gallon steel storage tank 12'D x 24'H
- 2). 30' x 30' x 5' Concrete pad with dike
- 3). 90' x 10' drum storage pad with 6" drain trench and 4' x 4' x 4' sump area.

These areas will be hydroblasted with 3000 to 3500 P.S.I. pressure at 205 degrees fahrenheit. An estimated cost of \$3200.00 has been given verbally by phone. This estimate does not include disposal of any waste wash materials. If you desire a firm bid price, we would be glad to send a field engineer to inspect the job site for firm bid price.

Thank you for your consideration of inviting CTC to offer a bid price on this job.

We Propose hereby to furnish material and labor — complete in accordance with the above specifications, for the sum of:

_____ dollars (\$ _____).

Payment to be made as follows:

All material is guaranteed to be as specified. All work to be completed in a workmanlike manner according to standard practices. Any alterations or deviations from the above specifications involving extra costs will be executed only upon written orders, and will become an extra charge over and above the estimate. All agreements contingent upon strikes, accidents or delays beyond our control. Owner to carry fire, wind, damage and other necessary insurance. Our workers are fully covered by Workman's Compensation Insurance.

Authorized
Signature

Note: This proposal may be withdrawn by us if not accepted within _____ days.

Acceptance of Proposal

— The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Payment will be made as outlined above.

Date of Acceptance _____

Signature _____

Signature _____

#5
Karen /
Derick
FEB 25 1988

CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

February 19, 1988

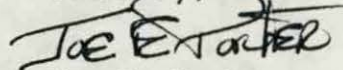
Karen Deere
Arkansas Department of Pollution Control & Ecology
P.O. Box 9583 - 8001 National Drive
Little Rock, Arkansas 72209

Re: West Helena Plant - Tank and Container Storage Area Closure

An amended closure plant is attached. Comments in your letter of January 15, 1988 have been addressed.

Upon closure, an assessment of the storage tank will be upgraded to meet the requirements of an accumulation tank prior to its reuse.

Sincerely,



Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
A.T. Malone

General Closure Statements

The following is a written closure plan for tank storage facilities and container storage facilities located at Cedar Chemical Corporation, West Helena, Arkansas. The closure plan follows the guidelines and requirements set forth in CFR 40, Part 265 and adopted by reference in the Arkansas Hazardous Waste Management Code. This closure plan is notification that Cedar Chemical Corporation is ceasing to conduct regulated activities of tank storage and container storage. The facility will retain its' status as a hazardous waste generator with EPA ID Number ARD 990 660 649.

Closure Performance Standard. This partial closure plan was designed to ensure that the facilities used for storage will not require further maintenance and controls except as those required under generator status for an accumulation facility.

Subsequent to the closure of the one storage tank and the container storage area, Cedar Chemical will maintain Generator status. The storage tank will assume the classification of a 90 day accumulation tank. The container storage area will also be used as a 90 day accumulation area for containerized hazardous waste.

The facility currently has one (1) storage tank and a container storage area classified as Hazardous Waste Management Units. Each unit is addressed separately in the following plan. When the plan for each unit is complete, it will constitute final closure. Post-closure care is not a requirement of the closure plan.

In the most recent Part B submittal, three tanks were listed as being used for storage. By letter to the Department on October 1, 1987, we submitted documentation of two tanks being used for accumulation rather than storage. Accumulation tanks are not

currently required to meet the financial requirements of 40 CFR Subpart H.

As of January 27, 1988, there are twenty drums stored in the container storage area. The storage tank has been empty and clean since April 1987. Drums will be removed and transported to an appropriate disposal facility in the early stages of closure. The exact facility is dependent upon the particular waste. It is anticipated that most of the current inventory will be incinerated by Rollins Environmental Services of Baton Rouge. Once these drums are removed clean up procedures will be implemented.

This closure plan is for tanks and containers used for storage. The facility will continue to use tanks and containers for less than 90 day accumulation. Therefore this is a partial closure plan for the facility.

The storage tank is not currently in use. The container storage area contains twenty drums and there is no routine generation of containerized hazardous waste. Therefore closure procedures, including transportation, storage, and disposal, will not be interfered with while clean-up procedures are being implemented.

2 The maximum inventory for the closure sites is (1) assumed to be the capacity of the storage tank, 20,000 gallons and (2) the actual maximum inventory for the container storage area, 37, 820 pounds. Maximum facility inventory is calculated as the maximum inventory for the container storage area plus the maximum, combined volume of tanks used for storage and/or accumulation, 68,000 gallons.

A soil sampling program will be instituted to determine the extent of any soil contamination in the area. The storage tank is surrounded by concrete and asphalt on three sides. At least two soil samples will be taken from the remaining side. The

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An independent, qualified, registered professional engineer will be employed for inspections and certifications.

Tank Storage

Maximum inventory for tank T-B112 is assumed to be the capacity of the tank, 20,000 gallons. The tank served to manage a D002, corrosive, waste. The last shipment of this waste was made to Rollins Environmental Services, Baton Rouge, La., in March, 1987. A total of 43,000 gallons was removed from the tank in March 1987. Manifests and shipping records are available for documentation.

Description of Tank T-B112

Vertical Orientation: diameter: 12 feet
height: 24 feet

Carbon Steel Construction

Maximum Capacity: 20,300 gallons
Operating Maximum Level: 18,000 gallons
Sidewall and Bottom: 3/8 inch carbon steel
Top: 1/4 inch carbon steel
Manway for side entry: 18 inch
Caged ladder on side
Vents to scrubber system or to carbon drum with flame arrestor/conservation vent
Inert atmosphere maintained with Nitrogen as required

A cleaning plan has been developed which includes elementary

neutralization of any remaining tank contents and a thorough washing with copious volumes of water. After the neutralization wash and each rinse, the tank contents will be examined analytically for the parameter of pH. Elementary neutralization may be required to bring the pH into an acceptable range. When within the range of non-hazardous waste criteria, the wash will be discharged from the tank to the on-site biological treatment system.

Associated Equipment. All piping and the pump connected to the tank will be treated in the same way. The pump and piping will be used to circulate the tank contents when washing. No brushes, shovels, or other tools will be used to clean the tank. The tank will not be dismantled, removed, or otherwise disposed of. Therefore no other equipment requires decontamination.

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Sampling Procedures. Washes and rinsates of the tank and its surrounding concrete dike will be sampled as grab samples in glass containers. Samples will be hand-carried to the plant laboratory and analyzed. Analysis will take place within one hour of sampling. Results will then be immediately available. Samples will be taken from the tank and/or the tank dike immediately prior to removal of any wash or rinsate. No removal will be made until results have demonstrated that the wash or rinsate is non-hazardous.

Testing Parameters. Analytical criteria for decontamination will be the value of pH. The pH value of all washes or rinsates must

be in the range of pH 5 to pH 10 prior to removal and discharge to the biological treatment system.

Analytical Method. The parameter of pH will be determined in accordance with the analytical method outlined in "Test Methods for the evaluation of Solid Waste: Physical/Chemical Methods," SW-846., and "Standard Methods for the Examination of Water and Wastewater", 16th Edition.

Certification. The tank and its surrounding concrete dike will be visually inspected by the Environmental Engineer and a Professional Engineer registered in the State of Arkansas. Laboratory analysis will be examined by the Laboratory Manager, the Environmental Engineer and a Professional Engineer. Upon satisfaction of these parties that the tank is clean and does not contain hazardous waste, the Professional Engineer will provide written certification to the company. A copy of this certification will be included with notice to the State of Arkansas that the tank closure is complete within 60 days of completion of closure.

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Container Storage

The container storage area for hazardous waste in drums consists of a concrete slab with center drain and a collection sump. The concrete area is surrounded by an asphalt work area and is sheltered by an aluminum roof structure.

Current (Oct 12, 1987) inventory consists of ignitable (D001) and F005 (Toluene greater than 10%) hazardous waste. These will be removed within 90 days of plan implementation. Disposal will be off-site to a commercial incinerator facility.

Once the current inventory of hazardous waste is removed, the area will be cleaned using a detergent solution in a high pressure washer. Washwater will be tested analytically for the parameters of pH and flash point. When within the range of non-hazardous waste criteria, the wash will be discharged from the sump to the on-site biological treatment system.

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Analytical Methods. Parameters of pH and flash point will be determined in accordance with analytical methods outlined in "Test Methods for the Evaluation of Solid Waste: Physical/Chemical Methods", SW-846.

Certification. The drum storage area will be visually inspected by the Environmental Engineer and a Professional Engineer registered in the State of Arkansas. Laboratory analysis will be examined by the Laboratory Manager, the Environmental Engineer, and a Professional Engineer. Upon satisfaction by those parties that the drum storage area is clean and does not contain hazardous waste, the Professional Engineer will provide written certification to the company. A copy of the certification will be included with notice to the State of Arkansas that the storage area closure is complete within 60 days of completion of closure.

After final closure of the drum storage area, the area will be used to manage containerized, hazardous waste with less than 90 days of storage. A containerized waste management program will document containers placed in the area. A monthly inventory will be conducted and manifests/shipping records will indicate movement and disposal.

Closure Schedule

Week 1	Planning & Schedule
Week 2	Soil Sampling/Analysis
Week 4	Tank Cleaning Tank Dike Cleaning
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Week 6	Remediation (as required)
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Closure Cost Estimate

T-B112 Storage Tank

Tank Cleaning - 48 man hours @ \$25.00	\$1200.00
Tank Dike Cleaning - 40 man-hours @ 25.00	1000.00
Wash Neutralization and disposal (on-site)	1000.00
Third party supervision	1200.00
Laboratory Analysis	1000.00

Container Storage Area

Hazardous Waste Inventory disposal (off-site)	16000.00
Concrete slab and pump cleaning - 40 hours @ 25.00	1000.00
Third party supervision	900.00
Laboratory Analysis	1000.00

Certification

Professional Engineering Services	2500.00
-----------------------------------	---------

\$26,800.00

CEDAR CHEMICAL CORPORATION

Karen
JAN 29 1988

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

540068
CSN: 540068 Permit No. _____
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

Jan 27, 1988

Karen Deere
Arkansas Department of Pollution Control & Ecology
P.O. Box 9583-8001 National Drive
Little Rock, Ar. 72209

Re: Treatment System Sampling & Analysis

Dear Karen,

Just for your information, the referenced sampling took place on January 15, 1988. A copy of the Chain of Custody Record is attached. We look forward to reviewing results with you in the near future.

Sincerely,

Joe E. Porter

Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
A.T. Malone

CHAIN OF CUSTODY RECORD

NAME OF COMPANY, CITY, OR PROJECT:

SAMPLERS: (signature)

SAMPLE COLLECTION LOCATION	DATE	TIME	COMP	GRAB	NO. OF CONTAINERS	ANALYSIS REQUIRED
Field Point # 1	1-15	1110		✓	6	*
2	1-15	1145		✓	6	*
3	1-15	1207		✓	6	*
4	1-15	1253		✓	6	*
5	1-15	1230		✓	6 + 6	* Field duplicate
6	1-15	1320		✓	6	*
7	1-15	1300		✓	6	*
8	1-15	1340		✓	6	*
9	1-15	1405		✓	6 + 6	* Field replicates

~~JEV~~ CEDAR Chemical Corp

JAN 15, 1988

RELINQUISHED BY: (signature)

RECEIVED BY: (signature) A25 DATE/TIME

K. E. Sorrells JAN 15, 1988

DISPATCHED BY: (signature)

RECEIVED FOR LABORATORY BY: DATE/TIME

[Signature]

Method of Shipment:
(CIRCLE ONE)

UPS

BUS

WALK-IN

SRA COURIER

OTHER COURIER

* per proposal schedule

NOTES:

(1) = SW. E. Q. pond 25' E of Intake pipe. (2) 60' NW SW corner (3) 125' N (4) 100' N of SE E Q pond (5) 110' N (6) Aer. D. discharge pipe top (7) Recycle Sludge from Aer. p. (1/100' N) (8) 25' N of SW corner pond (9) 125' N of SE E Q pond

40.2
JAN 29 1988

CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

Jan 25, 1988

Karen Deere
Arkansas Department of Pollution Control & Ecology
P.O. Box 9583 - 8001 National Drive
Little Rock, Ar. 72209

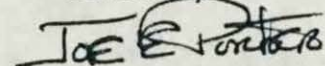
Re: Hydrogeologic Study

Dear Karen:

Attached is a revised proposal of services from Engineering, Design and Geosciences Group, Inc. Note that this is the same company as the previous proposal. However, a re-structuring has moved their Environmental Division from Geologic Associates, Inc. to The Edge Group.

Should you or your staff have further questions, please let us know. We can arrange a technical review meeting if desired.

Sincerely,



Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
A.T. Malone
Charles Johnson-ADPC&E



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

CERTIFIED MAIL #P-490 584 070
RETURN RECEIPT REQUESTED

PHONE: (501) 562-7444

January 15, 1988

CSN: 540068 Permit No. _____
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

Joe E. Porter
Environmental Engineer
Cedar Chemical
P.O. Box 2749
West Helena, AR 72390

Dear Mr. Porter:

RE: West Helena Site, Tank and Container Storage Area Closure

We have reviewed your closure plan dated September 14, 1987 for hazardous waste storage facilities located at West Helena, Arkansas.

The closure plan cannot be approved as submitted, enclosed are comments relative to our review. Cedar Chemical must either modify the existing plan or submit a new plan which addresses the deficiencies noted in the enclosure within thirty (30) days of receipt of this letter.

Upon closure, all tanks must meet the requirements for less than ninety (90) day storage. All tanks without secondary containment must have written assessments completed and maintained on file.

If you have any questions or concerns, please feel free to contact D. G. Warrick of my staff.

Sincerely,

Mike Bates

Mike Bates
Chief
Hazardous Waste Division

MB:DGW:fw:143

cc: Gary D. Martin
Karen Deere
Derick Warrick

GENERAL CLOSURE REQUIREMENTS

The description of the contents of the overall plan must identify the maximum extent of the operation which will be unclosed during the active life of the facility. This must include the methods for removing, transporting, treating, storing and disposing of all hazardous wastes while clean-up procedures are being implemented.

An estimate of the maximum inventory of hazardous wastes ever on-site over the active life of the facility is needed for the closure sites(s) and plant facility.

A detailed description of the methods to test all surrounding soils of the site(s) is needed along with procedures for removing and handling contaminated soils. Also a method to demonstrate success of decontamination of the site(s) is needed if contaminants are to be found.

A schedule must be provided indicating the total time required for closure. This should be broken down sufficiently to allow tracking of the progress for the closure.

The closure cost estimate must be based entirely on the cost to the owner or operator of hiring a third party to close the facility. A third party is a party who is neither a parent nor a subsidiary of the owner or operator.

Must state that the professional engineer to be independent of the company.

CLOSURE OF CONTAINER STORAGE AREA

A schedule of final closure of the storage area and for final closure of the facility is needed reflecting closure no later than 90 days from approval of the plan or a maximum of 180 days upon approval under a granted extension period.

Need schematic drawings(s) showing maximum extent of the storage area including drainage patterns of the surrounding area and proposed locations of soil sampling.

All wastewater generated through the cleaning process associated with toluene is considered hazardous waste and must be treated as such. The wash can only be discharged into the facility's wastewater treatment system only when the wash does not exceed 25 parts per million.

The operator/owner must submit plan to test the wastewater for the above parameters before discharging and/or describe the procedures for handling the hazardous wastes generated during clean-up activities.

CLOSURE OF TANK

Please demonstrate that the other two tanks previously filed with this tank are not required to perform to the rules and regulations and do not have to meet the same requirements.

A schedule for final closure of the tank is needed. This must include the time frame of any decontamination practices to be employed.

Need a diagram of piping and process flow.

Need a schematic drawing(s) showing dimension and layout of the tank including drainage patterns of the surrounding area with proposed location of soil sampling.

The drawings should include:

1. shape of the tank
2. material(s) of construction
3. inside, outside diameters
4. height and length
5. nominal and maximum capacities
6. description of appurtenances (manholes, nozzles, etc.)
7. stairways, supports, walkways, etc.
8. other relevant information

Karen JAN 08 1988

CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

Jan 4, 1988

Karen Deere
Arkansas Department of Pollution Control & Ecology
8001 National Drive - P.O. Box 9583
Little Rock, Arkansas 72209

Re: Hydrogeologic Assessment Plan

Dear Karen,

We have reviewed your comments of December 2, 1987 and also discussed technical aspects with Charles Johnson. The following items have been addressed. We have asked our consulting firm, Geologic Associates, Inc., to rewrite their proposal to classify certain items.

Per your letter:

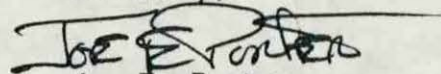
- we have asked Geologic Associates to review published material concerning the regional geology and hydrogeology of the area.
- the hydrogeologic assessment report will include:
 - (a) narrative description of geology
 - (b) geologic cross sections
 - (c) geologic maps
 - (d) boring logs
 - (e) raw data and interpretation
 - (f) narrative description of groundwater with flow patterns
 - (g) potentiometric maps with flow lines
 - (h) raw data and analysis of slug or pump tests (we prefer pump test)
 - (i) well construction logs
- we will locate one addition well cluster in the area bounded by Hwy 242, the industrial park road, and the active plant area.
- borings will be advanced to delineate a bottom confining layer.
- At least one boring will be placed in an area of the DNBK contamination. Precautions will be taken to prevent cross-contamination between the well and surface soil.
- The soil sampling system is defined on page 2 as a CME continuous sampling system utilizing a nominal 2.5 inch inside diameter, split barrel sampler. More details will be provided.

- As shown on site drawings, plant north is approximately 15 degrees east of true north. Plant north is an arbitrary designation being convenient because it is perpendicular to the Union-Pacific Railroad tracks. Both designations will be shown on all drawings and noted in narratives.

We agree with the comments about additional borings and/or piezometers. The project is to determine groundwater flow and direction. We will take the steps necessary to demonstrate this. We also agree with your comments concerning PVC versus stainless. We believe PVC will be quite acceptable as piezometers and some initial well sampling. However, for the long term we do intend to use stainless steel for monitoring well construction.

We anticipate this answers any questions concerning the hydrogeologic assessment plan. We are asking Geologic Associates to formalize their plan and should have it in the next two weeks.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe E. Porter", written over a horizontal line.

Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
A.T. Malone
Charles Johnson, ADPC & E

File



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

Certified Mail #P 490 584 044

December 2, 1987

Mr. Joe Porter
Environmental Engineer
Cedar Chemical Corporation
P O Box 2749
West Helena, AR 72390

CSN: 540068 Permit No. _____
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

RE: Consent Administrative Order

Dear Joe:

I have received and reviewed your letter of November 23, 1987 concerning the sampling and analysis plan for the surface impoundments. Due to your opting not to revise the plan itself but to cover the areas of concern which were outlined in my October 22, 1987 letter in the final report, the Department will defer approval of the work until review of the report. You are hereby authorized to start implementation of the sampling and analysis plan.

The hydrogeologic assessment plan dated November 10, 1987 was reviewed and found to be deficient for the following reasons:

- There were no plans to develop regional geology and hydrogeology of the area.

- There were no plans to develop site specific geology and hydrogeology which should include:

- (a) narrative description of geology; (b) geologic cross sections; (c) geologic maps; (d) boring logs; (e) raw data and interpretive analysis of material test; (f) narrative description of groundwater with flow patterns; (g) potentiometric maps with flow lines; (h) raw data and interpretive analysis of slug test and pump tests and; (i) well construction logs.

- One additional well cluster in the field south of Highway 242 is necessary.

- Borings should be advanced to delineate a bottom confining layer.

- At least one boring should be placed in an area of the dinitrobutyl phenol contamination

- The "state-of-the-art" soil sampling system must be defined.

- An explanation of plant north vs. true north should be provided.

It should be understood that depending on the results of the initial drilling more borings and/or piezometers may be necessary. Although piezometer clusters are to be installed, and one piezometer in any perched zone is acceptable, piezometers at different depths within the uppermost aquifer are necessary. This is to check for any vertical groundwater gradient. Approximate depths should be provided for all screens. Also, since the proposed wells are to be used solely as piezometers, PVC screen and casing is acceptable. Since organics would be a likely groundwater contaminant, PVC may not be acceptable for monitoring well construction.

Pursuant to paragraph 9 (b) of the CAO, revisions to the plan must be submitted to the Department within thirty (30) days of receipt of this letter.

If you have any questions, please feel free to call Charles Johnson or myself.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen Deere".

Karen Deere
Enforcement Branch Manager
Hazardous Waste Division

KD:fw

cc: Charles Johnson, ADPC&E
Legal Filed, ADPC&E

#12
Karen
NOV 30 1987

CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

CSN: 540068 Permit No. _____
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Log...

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

November 23, 1987

Karen Deere
Arkansas Department of Pollution Control & Ecology
8001 National Drive - P.O. Box 9583
Little Rock, Ar. 72209

Re: Consent Administrative Order - Paragraph 8

Dear Karen:

Concerning the sampling and analysis plan for the surface impoundments, the following items will be addressed in the final report:


1. Sampling:
 - Procedures
 - Containers
 - Preservatives
 - Field Sampling Logs
 - Chain of Custody Forms
 - QA-QC for Sampling
2. Analysis:
 - Analytical Methods
 - Detection Limits
 - QA-QC for analysis

We agree with your review of our plan and will address the above items. Should there be any questions concerning the samples or their analytical data, we will be prepared to resample.

We will also be prepared to expand our plan with further sampling and analysis should any samples be determined to meet hazardous waste criteria. Should this occur, we will endeavor to determine and define the extent of contamination and its originating source.

The Implementation Schedule for sampling is now revised to read that sampling will be performed within 45 days of the Plan's approval by the Department.

Sincerely,


Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
A. Malone

ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

MEMORANDUM

TO: Karen Deere, Manager, Enforcement Branch, HW Division
FROM: Charles Johnson, Geologist II, Enforcement Branch *cf*
DATE: November 23, 1987
SUBJECT: Review of Hydrogeologic Assessment Plan submitted by Cedar Chemical

This submittal is unsatisfactory because it gives few details of any activities planned in the assessment. In fact, this submittal is only a proposal to Cedar Chemical from Geologic Associates (GA) when GA bid on the project. I saw a copy of this when I visited Cedar Chemical in August.

An acceptable plan must include, as a minimum, the following:

1. Presentation of the regional geology and hydrogeology of the area. This information can be obtained from existing geologic and hydrologic information.
2. Presentation of site specific geology and hydrogeology. Included in this presentation should be:
 - (a) narrative description of geology;
 - (b) geologic cross sections;
 - (c) geologic maps;
 - (d) boring logs;
 - (e) raw data and interpretive analysis of material tests;
 - (f) narrative description of groundwater with flow patterns;
 - (g) potentiometric maps with flow lines;
 - (h) raw data and interpretive analysis of slug tests and pump tests;
 - (i) well construction logs.
3. It should be understood that, depending on the results of the initial drilling, more borings and/or piezometers may be necessary. Although piezometric clusters are to be installed, and one piezometer in any perched zone is acceptable, piezometers at different depths within the uppermost aquifer are necessary. This is to check for any vertical groundwater gradient. Approximate depths should be provided for all screens.
4. One additional well cluster in the field south of Highway 242 is necessary.
5. Borings should be advanced to delineate a bottom confining layer.
6. At least one boring should be placed in an area of the yellow contamination.

dinitrobutyl phenol

Page Two
Memorandum to Karen Deere
November 23, 1987

7. Since the proposed wells are to be used solely as piezometers, PVC screen and casing is acceptable. Since organics would be a likely groundwater contaminant, PVC is not acceptable for monitoring well construction.
8. GA speaks of their "state-of-the-art soil sampling system". The details of this system should be provided.
9. An explanation of plant north vs. true north should be provided.

CJ:lms



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

CSN: 540068 Permit No. _____
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

November 23, 1987

Mr. Joe Porter
CEDAR CHEMICAL CORP.
P.O. Box 2648
West Helena, AR 72390

Dear Mr. Porter:

RE: Compliance Response to CEI, ARD990660649

I reviewed the information which you submitted on November 9, 1987. The review revealed that the violations noted during the inspection have been corrected.

If I may be of assistance in the future, please contact me

Sincerely,

Sammy R. Bates

Sammy R. Bates
Hazardous Waste Inspector
Hazardous Waste Division

SRB:fw

Karen → Sammy

#2

CEDAR CHEMICAL CORPORATION

NOV 13 1987

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

CSN: 540068 Permit No. _____
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

November 9, 1987

Mr. Sammy R. Bates
Arkansas Department of Pollution Control & Ecology
8001 National Drive - P.O. Box 9583
Little Rock, AR 72209
11-9-87

Re: Compliance Evaluation Inspection Report of Oct. 9, 1987

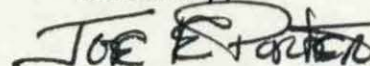
Dear Sammy:

In reply to your inspection report, we are responding with the following information:

1. and 2. Manifest corrections have been made. Communications were made in early August with Vicky Prevett. According to Vicky manifest information is currently correct.
3. We are attaching copies of our accidents and repairs to the original inspection report in addition to our separate files.
4. and 5. As mentioned in our telephone conversation, we have filed for closure of our facility for storage in tanks and drums. Accordingly we have filed a new facility closure plan including cost estimate. For your convenience we are attaching a copy of the latest closure plan and its' cost estimate.

Please contact us if we can provide further information.

Sincerely,



Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
A.T. Malone

Overview

The following is a written closure plan for tank storage facilities and container storage facilities located at Cedar Chemical Corporation, West Helena, Arkansas. The closure plan follows the guidelines and requirements set forth in CFR 40, Part 265 and adopted by reference in the Arkansas Hazardous Waste Management Code. This closure plan is notification that Cedar Chemical Corporation is ceasing to conduct regulated activities of tank storage and container storage. The facility will retain its' status as a hazardous waste generator with EPA ID Number ARD 990 660 649.

The facility currently has one (1) storage tank and a container storage area classified as Hazardous Waste Management Units. Each unit is addressed separately in the following plan. When the plan for each unit is complete, it will constitute final closure. Post-closure care is not a requirement of the closure plan.

Tank Storage

Maximum inventory for tank T-B112 is assumed to be the capacity of the tank, 20,000 gallons. The tank served to manage a D002, corrosive, waste. The last shipment of this waste was made to Rollins Environmental Services, Baton Rouge, La., in March, 1987. A total of 43,000 gallons was removed from the tank in March 1987. Manifests and shipping records are available for documentation.

A cleaning plan has been developed which includes elementary neutralization of any remaining tank contents and a thorough washing with copious volumes of water. After the neutralization

wash and each rinse, the tank contents will be examined analytically for the parameter of pH. Elementary neutralization may be required to bring the pH into an acceptable range. When within the range of non-hazardous waste criteria, the wash will be discharged from the tank to the on-site biological treatment system.

Associated Equipment. All piping and the pump connected to the tank will be treated in the same way. The pump and piping will be used to circulate the tank contents when washing. No brushes, shovels, or other tools will be used to clean the tank. The tank will not be dismantled, removed, or otherwise disposed of. Therefore no other equipment requires decontamination.

Containment Area. The containment area consists of a concrete floor and surrounding concrete walls. The internal dike area will be washed using a detergent solution in a high pressure washer. Washwater will be tested analytically for the parameter of pH. When within the range of non-hazardous waste criteria, the wash will be discharged from the diked area to the on-site biological treatment system.

Sampling Procedures. Washes and rinsates of the tank and its surrounding concrete dike will be sampled as grab samples in glass containers. Samples will be hand-carried to the plant laboratory and analyzed. Analysis will take place within one hour of sampling. Results will then be immediately available. Samples will be taken from the tank and/or the tank dike immediately prior to removal of any wash or rinsate. No removal will be made until results have demonstrated that the wash or rinsate is non-hazardous.

Testing Parameters. Analytical criteria for decontamination will be the value of pH. The pH value of all washes or rinsates must be in the range of pH 5 to pH 10 prior to removal and discharge to the biological treatment system.

Analytical Method. The parameter of pH will be determined in accordance with the analytical method outlined in "Test Methods for the evaluation of Solid Waste: Physical/Chemical Methods," SW-846., and "Standard Methods for the Examination of Water and Wastewater", 16th Edition.

Certification. The tank and its surrounding concrete dike will be visually inspected by the Environmental Engineer and a Professional Engineer registered in the State of Arkansas. Laboratory analysis will be examined by the Laboratory Manager, the Environmental Engineer and a Professional Engineer. Upon satisfaction of these parties that the tank is clean and does not contain hazardous waste, the Professional Engineer will provide written certification to the company. A copy of this certification will be included with notice to the State of Arkansas that the tank closure is complete within 60 days of completion of closure.

Subsequent to final closure, this tank will be placed back into service as a wastewater holding tank. Manifests, shipping records, and plant operating records will demonstrate that the tank will not be used for hazardous waste storage longer than 89 days.

Container Storage

The container storage area for hazardous waste in drums consists of a concrete slab with center drain and a collection sump. The concrete area is surrounded by an asphalt work area and is sheltered by an aluminum roof structure.

Current (Oct 12, 1987) inventory consists of ignitable (D001) and F005 (Toluene greater than 10%) hazardous waste. These will be removed within 90 days of plan implementation. Disposal will be off-site to a commercial incinerator facility.

Once the current inventory of hazardous waste is removed, the area will be cleaned using a detergent solution in a high pressure washer. Washwater will be tested analytically for the parameters of pH and flash point. When within the range of non-hazardous waste criteria, the wash will be discharged from the sump to the on-site biological treatment system.

Containment Area and Equipment. The asphalt area surrounding the concrete slab and the concrete sump will be cleaned in the same manner as the concrete area. If any shovels or brushes are used to facilitate cleaning, they will be washed before they leave the area. All washes will be tested for the parameters of pH and flash point. Washes will then be discharged to the biological treatment system.

Sampling Procedures. Washes and rinsates from the drum storage area will be sampled as grab samples in glass containers. Samples will be hand-carried to the plant laboratory for analysis. Analysis will be performed within one hour of sampling. Discharges from the area will not be made prior to receipt of analytical results, demonstrating that washes are non-hazardous.

Testing Parameters. Analytical criteria for decontamination will be the value of pH and flash point. The pH value of all washes must be in the range of pH 5 to pH 10. All flash point values must be greater than 140 degrees F. These values will be documented prior to removal and discharge of washes to the biological treatment system.

Analytical Methods. Parameters of pH and flash point will be determined in accordance with analytical methods outlined in "Test Methods for the Evaluation of Solid Waste: Physical/Chemical Methods", SW-846.

Certification. The drum storage area will be visually inspected by the Environmental Engineer and a Professional Engineer registered in the State of Arkansas. Laboratory analysis will be examined by the Laboratory Manager, the Environmental Engineer, and a Professional Engineer. Upon satisfaction by those parties that the drum storage area is clean and does not contain hazardous waste, the Professional Engineer will provide written certification to the company. A copy of the certification will be included with notice to the State of Arkansas that the storage area closure is complete within 60 days of completion of closure.

After final closure of the drum storage area, the area will be used to manage containerized, hazardous waste with less than 90 days of storage. A containerized waste management program will document containers placed in the area. A monthly inventory will be conducted and manifests/shipping records will indicate movement and disposal.

Closure Cost Estimate

T-B112 Storage Tank

Tank Cleaning - 48 man hours @ \$15.00	\$ 720.00
Tank Dike Cleaning - 32 man-hours @ 15.00	480.00
Wash Neutralization and disposal (on-site)	1000.00
Third party supervision	1200.00
Laboratory Analysis	1000.00

Container Storage Area

Hazardous Waste Inventory disposal (off-site)	16000.00
Concrete slab and pump cleaning - 72 hours @ 15.00	1080.00
Third party supervision	900.00
Laboratory Analysis	1000.00

Certification

Professional Engineering Services	2500.00
-----------------------------------	---------

\$24980.00

NOV 30 1987

CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

CSN: 500148 Permit No. _____
Media: Air, Water, Soil
Sort: Permit, Compliance, _____

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

November 23, 1987

Karen Deere
Arkansas Department of Pollution Control & Ecology
8001 National Drive - P.O. Box 9583
Little Rock, Ar. 72209

Re: Consent Administrative Order - Paragraph 8

Dear Karen:

Concerning the sampling and analysis plan for the surface impoundments, the following items will be addressed in the final report:

1. Sampling:
 - Procedures
 - Containers
 - Preservatives
 - Field Sampling Logs
 - Chain of Custody Forms
 - QA-QC for Sampling
2. Analysis:
 - Analytical Methods
 - Detection Limits
 - QA-QC for analysis

We agree with your review of our plan and will address the above items. Should there be any questions concerning the samples or their analytical data, we will be prepared to resample.

We will also be prepared to expand our plan with further sampling and analysis should any samples be determined to meet hazardous waste criteria. Should this occur, we will endeavor to determine and define the extent of contamination and its originating source.

The Implementation Schedule for sampling is now revised to read that sampling will be performed within 45 days of the Plan's approval by the Department.

Sincerely,



Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
A. Malone

ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

MEMORANDUM

TO: Karen Deere, Manager, Enforcement Branch, HW Division
FROM: Charles Johnson, Geologist II, Enforcement Branch *cg*
DATE: November 23, 1987
SUBJECT: Review of Hydrogeologic Assessment Plan submitted by Cedar Chemical

This submittal is unsatisfactory because it gives few details of any activities planned in the assessment. In fact, this submittal is only a proposal to Cedar Chemical from Geologic Associates (GA) when GA bid on the project. I saw a copy of this when I visited Cedar Chemical in August.

An acceptable plan must include, as a minimum, the following:

1. Presentation of the regional geology and hydrogeology of the area. This information can be obtained from existing geologic and hydrologic information.
2. Presentation of site specific geology and hydrogeology. Included in this presentation should be:
 - (a) narrative description of geology;
 - (b) geologic cross sections;
 - (c) geologic maps;
 - (d) boring logs;
 - (e) raw data and interpretive analysis of material tests;
 - (f) narrative description of groundwater with flow patterns;
 - (g) potentiometric maps with flow lines;
 - (h) raw data and interpretive analysis of slug tests and pump tests;
 - (i) well construction logs.
3. It should be understood that, depending on the results of the initial drilling, more borings and/or piezometers may be necessary. Although piezometric clusters are to be installed, and one piezometer in any perched zone is acceptable, piezometers at different depths within the uppermost aquifer are necessary. This is to check for any vertical groundwater gradient. Approximate depths should be provided for all screens.
4. One additional well cluster in the field south of Highway 242 is necessary.
5. Borings should be advanced to delineate a bottom confining layer.
6. At least one boring should be placed in an area of the yellow contamination.

Page Two
Memorandum to Karen Deere
November 23, 1987

7. Since the proposed wells are to be used solely as piezometers, PVC screen and casing is acceptable. Since organics would be a likely groundwater contaminant, PVC is not acceptable for monitoring well construction.
8. GA speaks of their "state-of-the-art soil sampling system". The details of this system should be provided.
9. An explanation of plant north vs. true north should be provided.

CJ:lms



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

Certified P-490 584 033

October 22, 1987

Mr. Joe Porter
Environmental Engineer
Cedar Chemical Corporation
P.O. Box 2749
West Helena, AR 72390

RE: Consent Administrative Order

Dear Joe:

The Department has received and reviewed your submission of September 21, 1987 concerning amendments to the original inspection plan. The resubmission is hereby approved with the following condition:

The Reporting of Accidents, Repairs, and Remedial Action log should be attached to the inspection log originating the response.

Paragraph 4 of the Order has been conditionally satisfied.

The submission dated September 15, 1987 pursuant to paragraph 5 of the Order has also been reviewed.

The sampling and analysis plan contains many references to the use of appropriate containers, preservatives, etc. The plan should detail the step-by-step sampling and analysis procedures, including but not limited to preservatives, chain of custody sheets, field sampling logs, containers used, analytical methods, detection limits, QA-QC for both sampling and analysis. In lieu of revising the plan, all the necessary information may be submitted in the resulting report. However, if the report includes or fails to include actions taken which place the validity of the samples or analytical data in question, resampling may be required. Please let me know what your preference is in this matter.

Also, the plan does not include further testing if any of the samples are determined to meet hazardous waste criteria. The extent of contamination would have to be defined.

The closure plan submitted on September 14, 1985 and the justification for removal of two tanks from the Part A are currently under review.

Therefore, please respond to the deficiencies in the sampling and analysis plan for the surface impoundments within thirty (30) days of the date of receipt of this letter.

If you have any questions, please feel free to call.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen Deere".

Karen Deere, Manager, Enforcement Branch
Hazardous Waste Division

KD:fw

cc: Sammy Bates, Inspector, Haz. Waste Div.
Legal file

CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

Karen
SEP 23 1987 #7

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

CSH: _____ Permit No. _____
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

September 21, 1987

Karen Deere
Arkansas Department of Pollution Control and Ecology
P.O. Box 9583 - 8001 National Drive
Little Rock, Ar. 72209


Subject: Consent Administrative Order, LIS 86-027

Dear Karen:

As noted in your letter of August 20, 1987, we have made amendments to our inspection plan which I believe you will find acceptable. Some of this was not included due to our interpretation of the Consent Order. We apologize for this oversight and anticipate that we have now answered your questions.

As of this date, in October we will be filing a closure plan for our storage facilities. This is a very important decision for Cedar Chemical Corporation and we request your assistance to make this a smooth transition.

Sincerely,


Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
A. Malone



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

CERTIFIED MAIL #P 291 319 027
RETURN RECEIPT REQUESTED

PHONE: (501) 562-7444

August 20, 1987 *Rec'd Aug 21, '87*

Mr. Joe Porter
Environmental Engineer
Cedar Chemical Corporation
Post Office Box 2749
West Helena, Arkansas 72390

Dear Joe:

RE: Consent Administrative Order

The Department has received and reviewed your correspondence dated August 11, 1987 submitted pursuant to paragraph 4 of the Order.

The inspection plan and log sheets are generally very well developed and easy to interpret. However, the following items as required by 40 CFR 265.15 were omitted:

1. The inspection plan fails to address the safety and emergency equipment (such as fire extinguishers, eye wash, etc.).
2. The inspection log fails to include space for documentation of the date and nature of repairs or remedial action.

The above deficiencies must be corrected to fulfill the requirements of paragraph 4 of the Order. Therefore, please resubmit, within thirty (30) days of the date of receipt of this notice of deficiency, an amended plan which corrects these omissions.

If you have any questions, please feel free to call.

Sincerely,

Karen Deere
Manager, Enforcement Branch
Hazardous Waste Division

KD:lms

cc: Phil Deisch, Chief Counsel, Legal Branch
John Miles, Plant Manager, Cedar Chemical Corp.
Sammy Bates, Hazardous Waste Inspector, HW Division

CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

8/11/87

Karen Deere, Enforcement Coordinator
Arkansas Department of Pollution Control & Ecology
8001 National Drive - P.O. Box 9583
Little Rock, Arkansas 72209

Subject: Consent Administrative Order, LIS 86-027

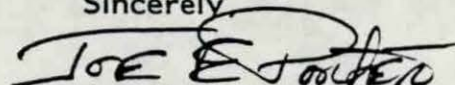
Dear Karen:

Attached are documents which include a written inspection plan and schedule for the container storage area to assure compliance with 40 CFR Part 265.15 (b). Other documents include our plan for the management of containers from the point of generation to disposition. These procedures are currently in operation at our facility and specifically identify hazardous versus non-hazardous waste.

We are currently constructing a shelter over the container storage area. This will aid us in handling rainwater which is currently collected, analyzed, and either containerized or disposed of on-site.

We welcome suggestions and additions to our written schedules. Please call us if you have any questions.

Sincerely,


Joe E. Porter
Environmental Engineer

cc: J.H. Miles - with attachments
G.L. Pratt - without attachments

Cedar Chemical Corporation

Utility Operator - Plant Inspections

Scope

The Utility Operator performs a variety of inspections on and around the plant site for purposes of security and integrity of plant operations. The inspections can be broken down into four basic areas: (1) production; (2) bulk storage which include storage tanks, dikes, and railcar and truck loading/unloading; (3) warehouses and drum storage and; (4) the stormwater handling and wastewater treatment.

An inspection log sheet is provided and inspections are made a minimum of one time per day. Certain areas dealing with security are inspected more frequently.

Inspections

(1) Production Areas

Production areas are inspected primarily for those operations which affect the biological treatment system. This includes each production unit and its wastewater handling system. A visual inspection of each unit sump area and its pump is performed. Any items found to be out of order are reported to the Shift Supervisor.

(2) Bulk Storage Areas

Railcars and bulk storage tanks are inspected for leaks and/or spills. Tank dikes are inspected for leaks, spills and rainwater content. All chemical leaks/spills noted are reported to the Shift Supervisor. Notes are made to include rainwater accumulation and integrity of tank dikes, tanks, and associated piping on the inspection log sheet.

(3) Warehouses are used to store plant supplies, raw materials, and finished goods. Notes are made of any leaks/spills of any materials and promptly reported to the Shift Supervisor. The drum storage area also includes raw materials, supplies, and finished goods. Leaks/spills are noted here also. Hazardous wastes are stored in drums on a slab dedicated for that purpose. In addition to leaks/spills, this area has a sump to catch leaks/spills. The Shift Supervisor is notified if there is leaked or spilled material in this sump.

(4) The stormwater handling system consists primarily of a series of ditches flowing to a stormwater sump in the southern corner of the plant site. Normal boiler blowdown, cooling tower blowdown, and light rainfall are pumped to the wastewater treatment system. Excessive rainfall is released through a parshall flume to the road ditch. This outfall is a permitted discharge point under the NPDES permitting system (Outfall 001). Any discharge through this point is logged on the inspection

sheet and sampled per laboratory instructions. Also notations are made concerning water levels in the ditches, status of the stormwater sump pump, and any evidence of leaks/spills in the stormwater ditches. Under normal conditions the valve to the road ditch is closed at all times except for stormwater release.

The wastewater treatment system consists of an API separator, equalization pond, a pump house, an aeration basin, 2 chain and flight clarifiers, a final polish pond, and a pumping station to the Mississippi River. Log sheet inspection items include flowmeter readings, pond levels, aerator operation, and pump operation. Equipment out of order is reported to the Shift Supervisor. Sampling for NPDES and internal requirements is coordinated through the laboratory Environmental Analyst and the Environmental Engineer.

CEDAR CHEMICAL CORPORATION

Revised Jan 19, 1987

Hazardous Waste Drum Storage Area General Operating Conditions

The drum storage area is designed to meet RCRA requirements for the storage of a maximum of about 80 drums of hazardous waste. All drums are stored on pallets. They may be stacked 2 high as long as sufficient room is allowed to visually inspect all drums. The concrete slab contains a grated, center trench which drains to a sump on the plant-north end. The concrete slab is sloped toward this center drain. As asphalt apron surrounding the concrete slab allows a work area. The asphalt area is not to be used for drum storage of hazardous waste.

All drum stored in this area will be properly labeled and identified as to their contents and hazardous criteria. Proper labels for hazardous communication are also required. Drums containing non-hardous materials, raw materials, intermediate, or finished goods should not be stored in this area. A separate storage area is provided for non-hazardous materials. All drums, regardless of their contents will have identifying markings as to their contents. Any drums not properly identified are to be dated, numbered and sampled. The laboratory will complete a Hazards Assessment Report for all drummed materials.

Inspections

The drum storage area is inspected a minimum of once per day, with normal inspections to take place three times per day. These inspections are made visually by the Utility Operator. this inspection includes an examination of all hazardous waste drums and the storage area including the sump area. The drums are inspected for leaking chemicals. The storage and sump area is inspected for evidence of leaks or spilled material. The sump area is inspected for material which may have drained into it and for liquid level. If the sump contains spilled or leaked material it is to be logged on the inspection report and sampled for analysis of hazardous materials and/or hazardous characteristics. The identification of any leaking or spilled material will also be logged on the inspection report as to the identifying marks on the leaking or spilled drum.

In addition to leaked or spilled material in the sump, rainwater may also be present. On the basis that there are no leaking drums or evidence of spills on the drum storage area, the sump contents will be inspected visually for chemical contamination and analytically for pH. Chemical contamination requires the chemical in the sump to be placed in appropriately labeled drums and placed on the slab. Adjustments of pH with the range of pH 5 to pH 9 renders this parameter acceptable to the biological

treatment system (in the absence of hazardous chemical contamination).

Reports

Inspection reports are reported to the laboratory Environmental Analyst. All leaks and/or spills will be immediately reported to the Shift Supervisor, the Environmental Engineer, and the Plant Manager.

Inspection Items to Look For

Operating and Structural equipment	Sump pumps	Power, clogging, bearings, seals
	Dikes	Cracks, deterioration, rainwater levels leaks or spills
	Sump areas	Erosion, uneven settlement, cracks in concrete, liquid levels
	Tank structural supports	Concrete deterioration and cracking, corrosion of pipe supports
	Piping to tanks	Leaks, corrosion
	Tanks	Corrosion, discoloration, cracks, bulges
	Storage areas	Leaks, spills, corrosion
Container storage area	Container placement and stacking	Aisle space, height of stacks
	Sealing of containers	Open lids
	Labeling of containers	Improper or no identification, missing dates
	Containers	Corrosion, leakage, spills

CEDAR CHEMICAL CORPORATION
UTILITY OPERATOR INSPECTION LOGSHEET

DATE _____

TIME _____

OPERATOR _____

LOCATION	CHECKPOINT	REMARKS	TIME
Lab Sump	% full Pump OK?		
Permethrin/ Propanil Sump	% full Pump OK?		
BSC SUMP	% full Pump OK?		
Nitration Unit Sump	% full Pump OK?		
DRA Sump	% full		
Scale Sump	If Water Present	Contact Robert Ray	
Tank Dikes	Cells full? Leaks/spills?		
Railcars	Leaks/spills?		
Process Areas	Leaks?		
Warehouses	Spills?		
Drum Storage Sump Level	If Leaks/Spills If Water Present	Contact Supervisor Contact Supervisor	
Stormwater ditches	% full		
Stormwater Outfall	discharge valve open? Time opened meter reading Time closed meter reading		
Treatment Ponds	Equalization pond level Bio pond level Polish pond level Aerators on and OK? Odors?		
API Separator	Leaks? Meter reading pH		
Pump House	Leaks/spills? PE-106 - % flow PE-107 - % flow PE-108 - % flow Blower oil level		
North clarifier	On and OK?		
South clarifier	On and OK?		
River Pumps	On and OK? % flow Meter reading		
Pipelines	Leaks?		
T-008	level - gallons		

NOTES:

Operating Procedures for Utility Operator Inspection Logsheet

Lab Sump - This sump is located on the west side of the shower room/laboratory and receives effluent from the front offices, shower room, and laboratory. Check this collection point for level and that the pump is operating properly. The pump is equipped for automatic level control. All effluent is pumped to the biological treatment system.

Permethrin/Propanil Sump - This area collects all surface drainage from the Permethrin and Propanil process area and includes steam condensate, some rain water, and water used to clean the process areas. With some extreme exceptions, all effluent from this area goes to T-PE209 and then to off-site disposal. Report the sump level and that the pump is operating properly. No automatic level controls are present. Contact the unit operators or the Shift Supervisor if the sump is full.

BSC Sump - This area collects steam condensate and water used to clean the BSC process area. In addition, it may serve as a collection point for rain water from tank dikes. All pump controls are manually operated. Report the sump level and pump operation. Contact the unit operators or the Shift Supervisor if the sump is full. Effluent goes to the biological treatment system. If a spill occurs, contact supervision for operation of the pump.

Nitration Unit 4 Sump - This area collects steam condensate and water used to clean the process area. In addition, it serves as a collection area for rainwater from tank dikes. Pump operation is manual. The area is also equipped with a phase separation tank for spill control. Report the level and that the pump operates properly. Contact the unit operators or the Shift Supervisor if the sump is full. All effluent goes to the biological treatment system except in the case of a spill. For this, contact the Shift Supervisor immediately.

Unit 5 Sump - This area serves as a collection point for steam condensate and water used to clean the process area. Pump operation is manual. All effluent goes to the biological treatment system. Report the sump level and that the pump operates properly.

Scale Sump - This area is located at the truck scale platform and may contain rainwater. Check for rainwater and, if present, contact the Shift Supervisor and/or the Maintenance Supervisor.

Stormwater Outfall - A valve opening to the industrial park road is for the purpose of releasing excessive stormwater. The valve is normally closed to maintain integrity of the spill control plan. The collection area is designed to retain to first 100,000 gallons of rainfall. If rainfall exceeds this amount, the valve may be opened with the permission of the shift supervisor and laboratory. Report the times at which the discharge valve is opened and closed. Also report the meter reading on the discharge meter.

Treatment Ponds - The biological treatment consists of three ponds: the large equalization basin, a smaller aeration pond, and a final polish pond. Each of these ponds contains floating aerators. In addition the equalization pond is also aerated by a blower. Report the level of these ponds and that all aerators are working. Report any floating matter, odors, or other unusual occurrences.

API Separator - Located on the southeast corner of the equalization pond, the API Separator serves as the influent point. Report any leaks, the influent meter reading, and sample the influent for pH. Report immediately to the shift supervisor if the pH is below 2.5 or above 12. Note to shift supervisors: If pH is less than 2.5 or greater than 12, stop all influents to treatment system. Determine cause and source of pH, and file incident report giving all details. Report immediately to Plant Manager and Environmental Engineer.

Pump House - All movement of water in the treatment system is done by pumps. PE-106 transfers from the equalization basin to the aeration pond. PE-107 A and B pump from the aeration pond to the clarifiers. PE-108 A and B return sludge from the clarifiers. Report any leaking pump seals and the flow-meter readings. Check the blower for operation and oil level.

North Clarifier/South Clarifier - The clarifiers are essential parts of the treatment which serve to return sludge to the aeration basin. Report that the clarifier chain drives are operating.

River Pumps - Two pumps manifolded together serve to pump final effluent through a 4.5 mile pipeline to the Mississippi River. A circulation loop returns excess flow to the polish pond. At least one pump will be operating at all times. A meter inside the pump house records flow to the effluent pipeline. An automatic sampler is provided for once-per-week sample collection. Other samples for pH are taken manually at least once per day. Report pump operation and meter operation. Report percent flow and the effluent meter reading.

Tank Dikes - Tank dikes are a part of the plant's spill control plan. However, they also collect rainwater and condensate. Inspect each and every dike for leaks, spills, and rainwater. If no leaks or spills are present, rainwater may be pumped to the treatment after the laboratory has checked pH and flash point. Report all leaks or spills to the unit operator and shift supervisor immediately. Write the tank number of an area needing emptying in the "notes section of the logsheet and notify the Shift Supervisor of high level conditions.

Railcars - The rail spur is a potential source of leaks and/or spills. Inspect this area thoroughly, especially around hose/pipe connections and pumps. Report all leaks immediately to the unit operator and the shift supervisor.

Warehouses - Raw materials and final products in drums are stored in the warehouses and on the loading area. Inspect this area for leaking drums and/or spills. Make notes on the logsheet and immediately report any leak or spill to the shift supervisor.

Drum Storage - There are two drum storage areas for waste or recyclable materials. (1) An area north of the nitrogen tank for non-hazardous wastes and/or materials to be recycled into production. Report all leaks and/or spills in this area to the Shift Supervisor immediately. (2) A dedicated drum storage slab to the east of the nitrogen is for storage of hazardous waste drums only. Report immediately to the Shift Supervisor if there are any leaks and/or spills in this area. A sump located on the north end of this storage area will retain leaks and rainwater. Report rainwater level in this sump. The Shift Supervisor will remove collected rainwater as soon as is practical after the laboratory has analyzed the sump contents for contamination with hazardous wastes. Non-hazardous rainwater may be transferred to the treatment system. Hazardous materials will be containerized for further disposition. Re-drum any leaking containers.

Stormwater Ditches - The plant site has a network of ditches which drain rainwater, boiler blowdown, cooling tower blowdown, and water from washing non-process areas to a collection point in the southeast corner of the plant site. This ditch network is also part of an overall plan for spill control. The collection area and ditches should remain at a minimum level at all times by pumping collection area contents to the treatment system. Report the collection area and ditch levels and make note of the stormwater pump operation.

Pipelines - Underground lines carry stormwater and process water influent to the treatment system, between ponds and the clarifiers, and final effluent to the river. Report immediately any pipeline leaks to the Shift Supervisor. Note to Shift Supervisors: If a pipeline is leaking, shut off all sources of flow connected with that pipeline and implement spill control and clean-up procedures immediately. Sample any leaked material and complete an incident report with as many details as possible. Report incident as soon as possible to the Plant Manager and Environmental Engineer, especially if any material is leaked off the plant's property.

Cedar Chemical Corporation

MANAGEMENT OF CONTAINERIZED WASTE

June 1987
R. Fairchild

This program is intended to provide all personnel with the information needed to insure the proper management of all contained waste at this facility.

Section I. MINIMIZATION PROGRAM - TO PREVENT THE GENERATION OF WASTE;

1.0 Waste that is generated and is contained in drums is very costly both in the manhours to manage it and in the disposal of it. This expense cuts into the profit of any operating unit. Contained waste also provides a source of environmental and safety hazards.

2.0 Before any waste is collected and contained in a drum or other container, the operator will consult supervision.

3.0 Supervision will be vigilant in providing preventive measures to avoid the collection of waste in all processes by working with the technical staff and operators.

4.0 Supervision will be responsible for consulting with the technical staff in an effort to minimize waste generated in any clean up operation involving vessels, tank dikes, sumps and storage areas. (Section IV 1.0)

5.0 Supervision will continually survey for potential trouble spots that may cause the collection of waste and will provide the procedure to prevent it.

6.0 All personnel are required to consult supervision when a collection of waste becomes necessary and/or have suggestions that may prevent the collection of waste.

Section II. MANAGEMENT OF WASTE PROGRAM;

WHEN IT IS NOT PRACTICAL TO AVOID THE COLLECTION OF WASTE MATERIAL AND SUPERVISION AND THE TECHNICAL STAFF HAVE BEEN CONSULTED, THE FOLLOWING POLICY WILL BE ADHERED TO BY ALL PERSONNEL. SUPERVISION WILL BE RESPONSIBLE IN ENFORCING THE FOLLOWING POLICY;

1.0 All waste that cannot be recycled, recovered or transferred to the ponds will be contained in appropriate, approved containers.

2.0 The Unit Supervisor will insure that the minimization program has been carried out in full. (Section I, 1.0) He will then initiate the ASSESSMENT RECORD FOR WASTE MATERIALS document (Exhibit A) and will insure that the Management of Waste Program is carried out in full. (Exhibit B)

3.0 The operator will stencil the drum(s) as to its contents, stencil his initials on the drum(s), insure that the approved drum is not leaking and that the exterior is clean.

4.0 The Unit Supervisor will inspect the contained waste, submit the ASSESSMENT RECORD FOR WASTE MATERIALS document and a properly labeled sample of the material to the laboratory.

5.0 The contained waste will remain in the unit until final disposition and the characterization has been made by the technical staff.

5.1 The laboratory will characterize the material and submit to technical staff for coordinated disposition.

6.0 The laboratory will submit a copy of the ASSESSMENT RECORD FOR WASTE MATERIALS to the Environmental Engineer who will determine container disposition (e.g. hazardous waste drum storage) and so note on the assessment record. A copy of the completed assessment record will be given to the Unit Supervisor, the laboratory, and the plant manager. The environmental engineer will maintain a file of the original assessment forms.

7.0 The Unit Supervisor will file his copy of the assessment record. The assessment record will inform him of what kind of waste is in the drum(s) and will have the lot number that is to be assigned and stenciled on the drum(s). (Exhibit C)

8.0 The Unit Supervisor will have the lot number stenciled on the drum, top & 4 places around side, insure that the material is inventoried and recorded in the proper log book (Section III, 2.0-3.0) and will instruct the operator to locate the material in the designated area. (Section III)

9.0 The Environmental Engineer will follow up with a survey to confirm that this material has been properly located and conforms to this policy.

10.0 The Environmental Engineer will make provisions for the disposal or recycle of the material.

11.0 The Environmental Engineer will continue to inform supervision of any changes in the requirements of containerized waste as soon as possible.

Section III. DESIGNATED WASTE STORAGE AREAS;

NOTE; ONLY THE UNIT SUPERVISOR HAS THE AUTHORITY TO INSTRUCT OPERATIONS TO REMOVE CONTAINED WASTE FROM THE UNIT OR AREA OF GENERATION. THIS IS ONLY AFTER CONSULTING WITH THE TECHNICAL STAFF FOR POSSIBLE RECYCLE MEASURES AND AFTER FULL CHARACTERIZATION AND CLASSIFICATION OF THE MATERIAL HAS BEEN MADE PER Section II.

1.0 The HAZARDOUS WASTE STORAGE AREA is located on the south end of the plant. It is a concrete slab with a sump for drainage. Only hazardous waste which has been properly identified, classified, stenciled, placed in the proper DOT approved drums, and has been recorded and accounted for in the HAZARDOUS CONTAINED WASTE LOG BOOK and the ASSESSMENT RECORD FOR WASTE MATERIAL document will be placed in this area.

1.1 A hazardous waste label will be properly filled out and placed on each drum.

1.2 A hazardous waste lot number and the major component or description of the contents will be stenciled on the drum(s).

2.0 The NON-HAZARDOUS WASTE STORAGE AREA is located on the north side of the nitrogen storage tank. Only non-hazardous waste and recycle material which has been properly identified, classified, stenciled, placed in the DOT approved drum, and has been recorded and accounted for in the NON-HAZARDOUS CONTAINED WASTE LOG BOOK and the ASSESSMENT RECORD FOR WASTE MATERIAL will be placed in this area.

2.1 A non-hazardous waste lot number and the major component or description of the contents will be stenciled on the drum(s).

Section IV. GROSS PRODUCTION OF WASTE MATERIAL TO BE
CONTAINED;

THIS IS AN EFFORT TO PLAN AHEAD FOR LARGE AMOUNTS OF CONTAINED WASTE THAT MAY BE PRODUCED IN CLEAN UP OPERATIONS OF SUMPS, TANK DIKES, VESSELS AND STORAGE AREAS.

1.0 When it becomes necessary to clean out sumps, railcars, tank dikes, vessels, etc. supervision will consult with the technical staff for planning and evaluation of the operation.

1.1 When appropriate, a sample of the material will be provided.

1.2 All efforts will be made to recycle, recover or make acceptable to the plant treatment system (ponds), any washes.

1.3 The technical staff will be consulted in selecting a suitable solvent or wash.

2.0 When cleaning out storage areas, all material that is contained that is not identified, or is waste, will not be removed from the area and will be treated like any other waste set forth by this program.

ALL DEPARTMENTS ARE INCLUDED IN THIS PROGRAM. ANY DEPARTMENT THAT FINDS UNIDENTIFIED DRUMS OR WASTE WILL FOLLOW THIS POLICY.

CEDAR CHEMICAL CORPORATION
WEST HELENA PLANT
ASSESSMENT RECORD FOR WASTE MATERIAL

EXHIBIT A

ASSESSMENT RECORD FOR WASTE MATERIALS

DATE; _____ SUPERVISOR; _____ ORIGIN; (unit or area
of generation) _____
DRUM ID; _____ (description of contents) _____ NUMBER OF DRUMS; _____

PHYSICAL CHARACTERISTICS

COLOR; _____ PHYSICAL STATE @ 70°F: SOLID; _____
SEMI-SOLID; _____ LIQUID; _____
LAYERS; _____ FREE LIQUIDS: _____ % SOLIDS; _____
AQUEOUS WASTE; _____ ORGANIC WASTE; _____

HAZARDOUS ASSESSMENT

pH _____ Sp. GR. _____ FLASH POINT; _____
CORROSIVE; _____ POISON; _____ FLAMMABLE; _____

ORGANIC CHARACTERISTICS:

<u>COMPOUND</u>	<u>PERCENT</u>	<u>COMPOUND</u>	<u>PERCENT</u>
1. _____		7. _____	
2. _____		8. _____	
3. _____		9. _____	
4. _____		10. _____	
5. _____		11. _____	
6. _____		12. _____	

THE SAMPLE AND THE DRUM MUST HAVE THE LOT NUMBER ON THEM
IF THE FLASH POINT IS BELOW 140 DEGREES F AND/OR IS A CORROSIVE,
POISON OR HAS A pH OUTSIDE OF THE RANGE OF 2 to 12.5, THE
MATERIAL IS HAZARDOUS.

DRUM LOT NUMBER; _____ (see exhibit C)

DRUM DISPOSITION; 1. _____ Hazardous Waste Storage
(By Environmental Engr.) 2. _____ Non-Hazardous Waste Storage
3. _____ Recycle To Process
DATE; 4. _____ Other _____
SHIP DATE; _____
B.O.L. NO.; _____
MANIFEST NO.; _____

EXHIBIT B

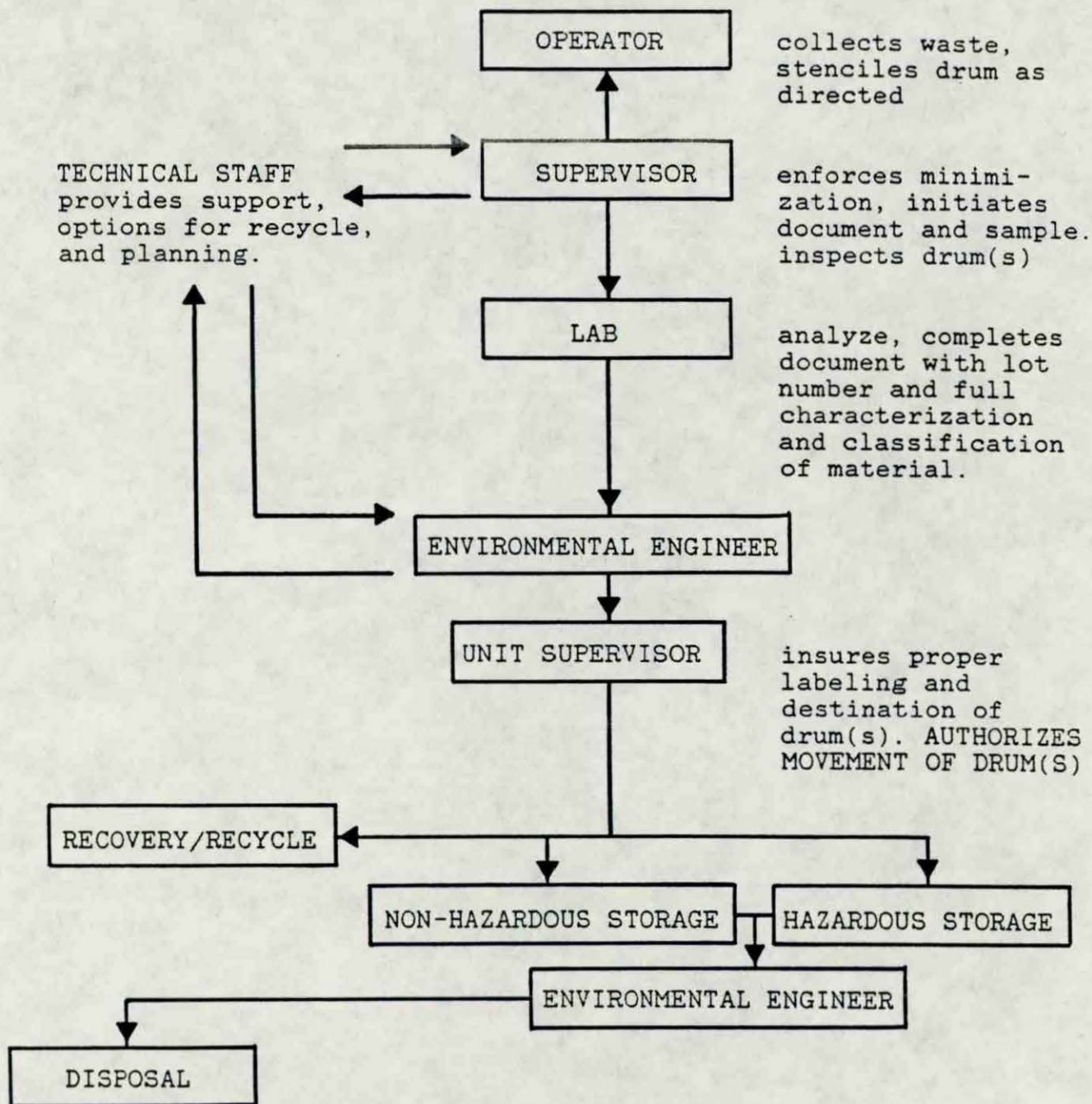


EXHIBIT C

ASSIGNMENT OF LOT NUMBERS

HAZARDOUS;

HW XX X XX - XX

Prefix Month Year Day Sequence

EXAMPLE;

H04714-01

H04714-01

H04714-01

Three drums of same material,

same day

H04714-02

H04714-03

Different material, same day

H04715-01

Different material or next day

NON-HAZARDOUS;

NH XX

X

XX

- XX

Prefix

Month

Year

Day

Sequence

EXAMPLE;

NH04714-01

NH04714-01

NH04714-01

Three drums of same material,

same day

NH04714-02

Different material, same day

NH04715-01

Different material or next day

Plant Safety Equipment Inspection

The following plant personnel are involved in plant safety equipment inspections:

- Safety Supervisor
- Utility Operator
- Day Operations Supervisor
- Shift Supervisor.

The following is a description of categorized safety equipment, who makes the inspection and what is checked during the inspection, attached to this report are copies of the different types of inspection sheets.

Respiratory Equipment

Self contained breathing apparatus (SCBA).

Inspection is made by the utility operator monthly.

Items checked: clips (15) - Hose - Straps - Exhalation Valve - Face Seal - "O" Ring - Harness Straps - Alarm - Regulator - Overall Condition - Diaphragm.

Defective SCBA units are returned to the manufacturer for repairs and at least every five years for reconditioning.

Gas Mask

A gas mask is cleaned each time it is worn. A gas mask is issued out and cleaned by the utility operator. In order to clean a gas mask it has to be taken apart then put back together.

Air Line Respirators

After each use by operations personnel air line respirators are cleaned by the utility operator and inspected by the shift supervisor and lead operator.

Items checked are: Shoulder Strap - Screws on Mask - Overall Condition - Air in Emergency Bottle.

Mechanical Resuscitator

Mechanical resuscitator is checked by the utility operator. Item checked is the amount of air in bottle. This is a weekly check.

Stretcher

Stretchers are checked by the utility operator weekly.

Emergency Lights

Emergency lights are checked by the utility operator weekly.

Emergency Rain Suits and Rubber Gloves

These items are kept in various locations in the plant, and are checked by the utility operator on a weekly basis.

Fire Fighting Equipment

Fire extinguishers are checked by the utility operator. Extinguishers are checked for guage pressure once a month. Fire hoses are checked by the utility operator once a month. Fire hydrants and monitors are checked by the utility operator once a month by turning them on. Tank farm sprinklers are checked by the utility operator by turning them on once a month. Wheeled fire extinguishers (350 lb) are checked by the utility operator by checking the pressure guage once a month. Foam cart is checked by the utility operator once a month.

Showers and eyewashes

Emergency showers and eye washes are checked by the utility operator by turning them on once a month.

Cyanide Antidote Kit

Seals are checked weekly by the utility operator.

Hydrogen Cyanide Monitors

Monitors are checked by a test gas from a generator when they are issued out.

Miscellaneous

Explosion meters and oxygen meters are checked monthly by the safety supervisor using a test gas. Railroad sign for connected cars is checked by the Utility Opeator once per month.

When checking safety equipment if problems or defects are found a work order is written on items that can be repaired by plant maintenance, however do to the nature of the equipment some repairs have to be made by the manufacturer. This repair would therefore require a purchase order and a material release sheet. A copy of the completed work order will be attached to the appropriate check sheet.

SCBA CHECK LIST

DATE _____

SHIFT _____

1. _____ Clips (15)
2. _____ Hose
3. _____ Straps
4. _____ Exhalation Valve
5. _____ Face Seal
6. _____ "O" Ring
7. _____ Harness Straps
8. _____ Alarm
9. _____ Regulator
10. _____ Over-All Condition
11. _____ DIAPHRAGM

INSPECTOR _____

MANAGEMENT INSPECTION CHECKLIST

DATE _____

INSPECTOR _____

I. WALKING - WORKING SURFACES

GOOD

BAD

LOCATION OR PROBLEM

A. WALKWAYS & WORK AREAS
FREE OF GREASE, OIL, WATER
SHAVINGS OR PAPERS

B. HAND RAILS & STAIRS IN
GOOD CONDITION

C. PORTABLE LADDERS MEET
STANDARDS

II. HEALTH & ENVIRONMENTAL CONTROL

A. ADEQUATE RESPIRATORY
PROTECTION FOR EACH UNIT

B. RESTROOM & BREAKROOM

C. SHOWERROOM

D. ADEQUATE VENTILATION FOR
PKG.

III. HAZARDOUS MATERIALS

A. COMPRESSED GASES BEING
HANDLED PROPERLY

B.

IV. PERSONAL PROTECTIVE EQUIPMENT

A. AIR LINE RESPIRATORS &

B. EMERGENCY EQUIPMENT &
RECORD KEEPING (FIRE EXT.)
SHOWERS AND EYE WASH

C.

V. MACHINE

A. GUARDS AND ELEVATOR CABLES

VI. ELECTRICAL

A.

B. ADEQUATE LIGHTING

C. OXYGEN METER _____ EXPLOSION METER _____

[illegible]

MONITOX UNIT CHECK LIST

[illegible]

AIR LINE RESPIRATOR CHECK SHEET

THIS CHECK SHEET WILL BE TURNED IN TO THE SHIFT SUPERVISOR ON DUTY BEFORE ANYONE WEARS THE RESPIRATOR.

DATE: _____ SHIFT: _____

LEAD OPERATOR: _____

SHIFT SUPERVISOR: _____

_____ SHOULDER STRAP WITH UNIT (SEE NOTE)

_____ SCREWS ON FACE SHIELD FRAME TIGHTENED

_____ NEGATIVE PRESSURE CHECK LEAVE AIR LINE RESPIRATOR DISCONNECTED FROM PLANT AIR.

PUT MASK ON AND TIGHTEN STRAPS INHALE (BREATHE IN) NO AIR SHOULD COME THROUGH.

OVER ALL CONDITION OF RESPIRATOR:

_____ CLEAN

_____ DIRTY

COMMENTS:

IF ANY ACCIDENTS OCCUR WITH THE AIR LINE RESPIRATORS ON THE SHIFT FOR WHICH THE CHECK LIST WAS FILLED OUT, ATTACH A COPY OF THE CHECK LIST TO THE ACCIDENT REPORT.

NOTE: THE SHOULDER STRAP MUST BE WORN WITH UNIT. WHEN PROPERLY ADJUSTED THE UNIT IS MORE COMFORTABLE TO WEAR. THE STRAP PREVENTS THE AIR BOTTLE FROM MOVING BACK AND FORTH, WHICH WOULD BREAK THE BOTTLE BRACKET.

9. Monitor - South east corner of DRA unit.

10. Monitor - East end of DRA tank farm

11. Hydrant - West end of DRA tank farm next to railroad.

12. Hydrant - North east corner of store

14. Monitor - South west corner of BSC tank farm.

15. Monitor - North east corner of Permethrin unit.

16. Monitor - By gasoline tank

17. Hydrant - By front gate

18. Fire hose box - Between monitor 5 & 7

19. Fire hose box - By monitor 9

20. Fire hose box - North east corner of store.

21. Fire hose box - By front gate

22. 350 lb. wheeled fire ext. - By flare

23. 350 lb. wheeled fire ext. - North west corner of P-10 packaging.

24. 350 lb. wheeled fire ext. by DRA motor control room.

25. 350 lb. wheeled fire ext. by front gate.

26. DRA sprinklers - DRA tank farm

27. Foam cart - In front of shift supervisor's office

INSPECTOR'S NAME _____

STRETCHER AND/OR BLANKET CHECK

B = Blanket

S = Stretcher

WEEKLY CHECK DATE

1. Shift supervisor's office B & S

2. Cypermethrin Control Room B & S

3. Shower Room S

Emergency lights B = bright D = Dim O = out,

WEEKLY CHECK DATE

1. Lab

2. Cypermethrin Control Room

3. Propanil Control Room

4. DRA Control Room

5. RP-10 Control Room

COMMENTS:

CYANIDE ANTIDOTE KIT AND OXYGEN MECHANICAL
RESUSCITATOR WEEKLY CHECK

DATE AND INITIAL

	1st week	2nd week	3rd week	4th week
1. Lab				
2. Safety Room				
3. Shift Supervisor's Office				
4. Cypermethrin Unit				

Emergency Rain Suits and Rubber Gloves

1. Lab				
2. Cypermethrin Control Room				
3. Shift Supervisor's Office				

Cyanide Alarm

1. Cypermethrin Control Room				
------------------------------	--	--	--	--

Inspector's Name and Date

SAFETY SHOWER and or EYE WASH

1. Shower - Inside main door of Lab.

2. Eye Wash - By Lab Restroom Door

3. Shower - By doorway separating two main rooms inside Lab.

4. Shower - In front of Propanil blend tank, Tank Dyke.

5. Eye Wash - Propanil Pkg. building.

6. Shower & Eye Wash - P-10 Pkg. building.

7. Shower & Eye Wash - In front of DRA Control room.

8. Shower - Bottom floor of DRA East end.

9. Shower & Eyewash - DRA second floor by R2.

10. Shower & Eye Wash - DRA second floor by R1.

11. Shower & Eye Wash - DRA catwalk by driers.

12. Shower & Eye Wash - DRA East end of tank farm.

13. Shower & Eye Wash - DRA West end of tank farm.

14. Shower & Eye Wash - RP-10 first floor by main stairway.

15. Shower & Eye Wash - RP-10 Second floor by main stairway.

16. Shower & Eye Wash - RP-10 Tank Farm in front of Acetic Anhydride tank.

17. Shower & Eye Wash - RP-10 Tank Farm by walkway to R.R. Track.

18. Shower - In front of caustic tank at tank farm - North of B.S.C. unit.

19. Shower & Eye Wash - First floor by main stairway of B.S.C. unit.

20. Shower & Eye Wash - Second floor in front of Control Room, B.S.C. unit.

21. Shower & Eye Wash - Third floor by stairway B.S.C. unit.

22. Shower - In front of Beer Glass at Permethrin tank farm.

23. Shower & Eye Wash - First floor Permethrin unit by fork lift pad.

24. Shower & Eye Wash - First floor Permethrin unit by main stairway.

25. Shower & Eye Wash - Second floor Permethrin unit by main stairway.

26. Shower & Eye Wash - Second floor Propanil unit by R-1 reactor.

27. Shower & Eye Wash- Second floor Propanil unit by R-2 reactor.

28. Shower & Eye Wash - First floor Propanil unit by R-2 reactor.

Reporting of Accidents, Repairs, and Remedial Action

During an inspection, or upon completion of an inspection, by the Utility Operator, any problem areas are immediately reported to the Shift Supervisor. Problems encountered usually fall under one of two categories: (1) involves an incident which has already occurred and involves personal injury, a human health hazard, or an environmental hazard; or (2) involves operation of non-essential equipment or secondary structures.

1. Special Accident Report. The Shift Supervisor or appointed personnel completes this form as to personnel involved, a description of the incident, injuries, possible causes, and subsequent actions taken to prevent the incident from reoccurrence or to repair damages caused. If remedial caction is required involving strucutral or mechanical equipment, the Supervisor completes a Workorder and issues to the appropriate personnel. If remedial action is required to effect damages resulting from the incident, a Workorder is completed and issued to Operations personnel. A copy of these Workorders indicating nature of repairs or other action taken is then attached to the initial Special Accident Report and submitted to the Plant Manager, Safety Director, Day Supervisor, and Environmental Engineer. A Supervisor's Accident Investigation Report is completed for all incidents involving personal injury.

2. Non-essential equipment or secondary structures requiring repairs may be reported by any plant personnel. A Workorder is then issued tp the appropriate department by the Shift Supervisor or Day Supervisor noting repairs to be made. Copies of Workorders are maintained as a portion of the plant's operating log and submitted to the Plant Manager and Engineering.

No. 3131

[illegible]

CEDAR CHEMICAL CORP.
SPECIAL ACCIDENT REPORT

DATE: _____

TIME: _____

PERSON'S INVOLVED: _____

DESCRIPTION OF ACCIDENT: _____

INJURIES IF ANY: _____

DISCIPLINARY ACTION TAKEN IF ANY: _____

REPORT PREPARED BY: _____

DATE: _____

SUPT. _____

PLANT MANAGER _____

SAFETY DIRECTOR _____

Actions taken to repair/replace structural or mechanical equipment involved.
Actions taken by personnel to effect any necessary cleanup ~~of the~~ resulting from accident.

SUPPLEMENTARY ACCIDENT REPORT FORM

CAUSE OF ACCIDENT _____

CONSULTATION WITH DOCTOR _____

CONSULTATION WITH EMPLOYEE, HIS IMMEDIATE SUPERVISOR,
ASSISTANT PLANT MANAGER, SAFETY SUPERVISOR & PLANT MANAGER

EMPLOYEE _____

SUPERVISOR _____

SAFETY SUPERVISOR _____

SUPERINTENDENT _____

PLANT MANAGER _____

DATE _____

SUPPLEMENTARY ACCIDENT INVESTIGATION FORM:

1. JOB FACTORS

- A. IMPROPER SELECTION OF EQUIPMENT
- B. INADEQUATE EQUIPMENT MAINTENANCE
- C. INADEQUATE STANDARDS
- D. POOR HOUSEKEEPING
- E. UNREALISTIC SUPERVISORY STANDARDS
- F. LACK OF PROPER SAFETY EQUIPMENT
- G. PERSONAL SAFETY EQUIPMENT IN NEED OF REPAIR

2. PERSONAL FACTORS

- A. POOR HIRING PRACTICE
- B. INADEQUATE EMPLOYEE INDOCTRINATION
- C. INADEQUATE SKILL TRAINING
- D. INADEQUATE SAFETY TRAINING
- E. IMPROPER MOTIVATION
- F. CARELESSNESS
- G. FAILURE TO FOLLOW SAFETY RULES AND REGULATIONS
- H. FAILURE TO REPORT KNOWN SAFETY HAZARD

VERTAC CHEMICAL CORP.
P.O. BOX 2648
WEST HELENA, ARKANSAS

☐ No lost time

SUPERVISOR'S ACCIDENT INVESTIGATION REPORT

☐ Lost time

ANSWER ALL QUESTIONS

OSHA # _____

INSTRUCTIONS: — In event of accidental injury to an employee, answer all questions IN FULL. Form should be completed immediately.

Injured employee (Name in full) _____ Social Security No. _____
Age _____ Sex _____ Phone _____
Department and location _____
Employee's address _____ Race or color _____

Date of accident _____ Time _____
Location of accident _____
Nature of injury _____

ACCIDENT
INJURY
AND
DESCRIPTION

Describe how accident occurred _____

Witnesses _____

ADMINISTRATIVE
DATA

Occupation when injured _____
Was this regular duty of employee _____
If not, state regular occupation _____
Wages: Hourly rate _____ Length of service _____
Temporary or permanent employee _____ Mo. rate _____
Will employee receive wages during disability _____
Did accident cause lost time _____ Date started losing time _____
Has employee returned to work _____ When _____
Actual number of days lost _____
If still off, give estimated number days lost _____
When did employee report injury to Foreman _____

PERSONAL
DATA

Treated at clinic _____ Yes ___ No ___
Treated at emergency room _____ Yes ___ No ___
Treated on the job _____ Yes ___ No ___
Name and address of attending physician _____
Name and address of hospital _____
If serious disability, give name and address of beneficiary _____

Date of report _____ Prepared by _____ Dept. _____

Supervisor

(Over)

SUPERVISORS — YOU ARE RESPONSIBLE FOR THE SAFETY OF YOUR
EMPLOYEES!

SUPERVISOR'S REPORT ON INVESTIGATION OF ACCIDENT

In order that we may have a more detailed report as to the cause of the accident in which this employee was involved and also that we may be informed as to the action taken to prevent a recurrence of similar accidents in the future, the Supervisor under whom the injured was working at the time of the accident will complete the following form. After the Supervisor has completed and signed the report, it is to be passed to the Superintendent for his approval before mailing to the Safety Director.

SUPERVISORS — ANSWER ALL QUESTIONS

Did you instruct injured employee of the job hazards and safety precautions to have been taken? Yes() No() If no, why? _____

Was injured wearing and or using proper safety protective equipment? Yes() No() If no, why? _____

Why was unsafe act committed? _____

Why did unsafe condition exist? _____

Did you know of unsafe condition? Yes() No() _____

What are you actually doing to prevent similar injuries? _____

Was the accident primarily caused by the injured's carelessness and/or thoughtlessness? Yes() No() _____

Did you discuss the accident with the injured employee? Yes() No() If no, why? _____

His remarks: _____

What was employee doing when the accident occurred? _____

What machine, tool, substance or object was most closely connected with the accident? _____

If machine or vehicle, what part of it? _____

In what way was the machine, tool or object defective? _____

How could the injured have prevented the accident? (Do not say, by being more careful) _____

Were mechanical guards or other necessary safeguards (such as goggles) provided? _____

APPROVED _____
Supt.

APPROVED _____
Plant Manager

APPROVED _____
Safety Director

WHAT TO DO IN CASE OF AN ACCIDENT

- A. IF CHEMICAL POISONING IS SUSPECTED SEND PERSON TO COMPANY DOCTOR'S OFFICE BETWEEN THE HOURS OF 09:00 AND 17:00 MONDAY THROUGH FRIDAY AND 09:00 to 12:00 ON WEDNESDAY. SEND PERSON TO HOSPITAL AT ANY OTHER TIME. ALWAYS SEND WITH THE PERSON A SLIP OF PAPER OR MSDS WITH THE NAME OF THE SUSPECTED CHEMICAL ON IT.

IF AT ALL POSSIBLE ALSO CALL THE HOSPITAL OR DOCTOR'S OFFICE AND TELL THE NURSE OR PERSON ON DUTY THE NAME OF THE EMPLOYEE AND THE CHEMICAL THAT IS SUSPECTED AND THE UNIT IT COMES FROM.
COMPANY DOCTORS;

MCDANIEL - PHONE NO. 338-8308
MCCARTY - PHONE NO. 338-7401
MONDAY THROUGH FRIDAY - 09:00 to 17:00
WEDNESDAY - 09:00 to 12:00

EYE DOCTOR; DR. FREDERICK - PHONE NO. 338-9882

HELENA HOSPITAL - PHONE NO. 338-6411

AMBULANCE - PHONE NO. 338-6707

IF THERE IS EVER A DOUBT AS TO THE SERIOUSNESS OF THE INJURY, SEND THE EMPLOYEE TO THE DOCTOR'S OFFICE OR TO THE HOSPITAL ACCORDING TO THE TIME OF THE ACCIDENT.

ALWAYS IF POSSIBLE CALL AHEAD TO THE HOSPITAL OR DOCTOR'S OFFICE AND GIVE THE EMPLOYEE'S NAME AND NATURE OF INJURY OR SUSPECT CHEMICAL AND THE UNIT IT COMES FROM IF CHEMICAL POISONING OCCURS.

ACCIDENT REPORTS

SUPERVISOR OR APPOINTED PERSONNEL WILL FILL OUT AN ACCIDENT REPORT AS SOON AS POSSIBLE. THE ACCIDENT REPORT WILL THEN BE GIVEN TO THE SAFETY DIRECTOR. IF THE SAFETY DIRECTOR IS NOT IN THE PLANT, THE ACCIDENT REPORT SHOULD BE SENT TO JOHN MILES.

FILL THE ACCIDENT REPORT OUT AS QUICKLY AND ACCURATELY AS POSSIBLE. ALL ACCIDENT REPORTS HAVE TO BE IN THE INSURANCE OFFICE NO LATER THAN 48 HOURS AFTER THE ACCIDENT.

INITIATE A WORKORDER TO REPAIR DAMAGES TO EQUIPMENT AND/OR ENVIRONMENT INVOLVED IN AN ACCIDENT. WHEN THE WORKORDER IS COMPLETE ATTACH A COPY TO THE ACCIDENT REPORT AND SUBMIT TO THE PLANT MANAGER.

EFFECTIVE; 7-28-78
REVISED; 1-30-86

COMPANY PHYSICIAN'S POLICY

IN ADDITION TO ANY DOCTOR A PERSON MAY WANT TO SEE, IT IS THE REQUEST OF CEDAR CHEMICAL CORPORATION THAT THE COMPANY DOCTORS; DR. MCDANIEL, OR DR. CHARLES P. MCCARTY BE IN CHARGE OF ANY CASE INVOLVING A WORK RELATED INJURY OR ILLNESS OF ANY EMPLOYEE.

CEDAR CHEMICAL CORPORATION

NON-ROUTINE PRODUCTION SAFETY WORK PERMIT

LOCATION: _____ DATE ISSUED: _____

TIME ISSUED: _____ TIME EXPIRES: _____

PERMIT AUTOMATICALLY EXPIRES AT THE END OF EACH SHIFT.

PERMIT ISSUED TO; (ONE PERSON'S NAME ONLY) _____

JOB DESCRIPTION: _____

NOTE: THIS PERMIT WILL BE VOID AND MUST BE RENEWED IN CASE OF
ACCIDENT OR CHANGE OF ABOVE CONDITIONS.

NO SMOKING IN UNAUTHORIZED AREAS
CHECK ONLY BOXES THAT APPLY

PROTECTIVE EQUIPMENT REQUIRED

- ___ REVIEW MSDS FOR _____
- ___ WEAR GOGGLES/OR FACE SHIELD
- ___ WEAR GLOVES - RUBBER
- ___ WEAR SAFETY BELT AND LINE
- ___ WEAR SELF-CONTAINED BREATHING APPARATUS
- ___ HAVE SELF-CONTAINED BREATHING APPARATUS AVAILABLE
- ___ WEAR HEARING PROTECTION
- ___ WEAR RAINUIT - FULL
- ___ RESPIRATOR NEEDED. SPECIFY TYPE: _____
- ___ ADDITIONAL SAFETY EQUIPMENT NEEDED THAT ARE NOT ON LIST

SIGNATURES ONLY: OPERATOR _____ L. OPERATOR _____
(1) SHIFT SUPERVISOR _____

JOB STATUS: COMPLETE _____ INCOMPLETE _____

Karen
RECD SEP 16 1987
#4

CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

CSN: _____ Permit No. _____
Media: Air, Water, Solid, Hazardous
Sub: Permit, Compliance, etc.

9/15/87

Karen Deere
Arkansas Department of Pollution Control and Ecology
8001 National Drive - P.O. Box 9583
Little Rock, Ar. 72209

Subject: Consent Administrative Order LIS 86-027

Dear Karen:

Attached is a narrative description of processes performed at the West Helena Plant since 1980. Information on the chemical and physical composition of process waste generated is included. Also attached is a proposed plan and schedule of implementation to sample and analyze all sludges, sediments, and liquids in the surface impoundments. A determination of whether such materials are hazardous wastes will be based upon the analytical results and current regulatory definitions.

In order to give some indication of activities at the West Helena Plant without creating a confidential document, the attached Table 1 is presented. The table relates manufacturing activity expressed as a percent of total plant revenue.

Sincerely,



Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
Allen Malone

Table 1

<u>Process</u>	<u>1980</u>	<u>1981</u>	<u>1982</u>	<u>1983</u>	<u>1984</u>	<u>1985</u>	<u>1986</u>
Propanil	73.63	76.97	58.04	49.40	50.72	63.90	61.03
Lannate	4.82	0.95					
DRA	4.76	9.27	22.79	16.29	12.77	9.15	0.03
BSC	5.80	0.01					
Permethrin	10.98	13.60	18.39	18.36	22.36	17.29	24.70
SCI			0.70	1.41	0.07	1.83	3.26
Arsenicals				14.03	10.43	6.83	
Services			0.07	0.95	3.01	0.20	
MTPO						0.80	5.66
RP-15							5.31

Summary of Manufactured Products - 1980 through 1986

1. Propanil. The manufacture of Propanil (3,4-Dichloropropionanilide) has continued to operate in the period of 1980 thru 1987. The process operates for an average of five to six months per year. The process generates a weak acid described as follows before neutralization:

Propionic Acid	3 to 5%
Propanil	Less Than 0.5%
3,4-Dichloroaniline	Less Than 0.5%
Water	95 to 97%
pH	2 to 4
Specific gravity	1.02
Flash Point	Greater Than 200 Degrees F

This weak acid is neutralized if necessary and treated in a biological treatment system. Final discharge is to the Mississippi River via Outfall 002 of NPDES Permit Number AR0036412.

2. Lannate. A methomyl insecticide product was formulated only for DuPont in 1979 and 1980. In the formulation, a technical material was received in fiber drums with liners. The liners were removed and returned to the manufacturer. The remaining fiber drums were crushed and shipped to the local sanitary landfill. Last date of actual manufacturing was 1978.

3. DRA. A polymer product was manufactured under contract with Atlantic-Richfield during the period of 1980 through 1985. Samples and off-specification product were shipped to CECOS International, Livingston, La. for solidification and landfill. The polymer waste was characterized as follows:

Kerosene	80 to 95%
DRA Co-polymer	11 to 12%
Ethylene Glycol	0.2 to 2%
Water	0 to 5%
Sodium Salts	Less Than 1%
Aluminum Salts	Less Than 1%
Titanium Salts	Less Than 1%
Viscosity	73,000 cp
Flash Point	120-150 Degrees F
pH	7 to 10
Density	6.6 lbs/gal

4. Benzene Sulfonyl Chloride (BSC) was manufactured as a chemical intermediate in 1980. A spent sulfuric acid generated was neutralized with sodium hydroxide which was then sent to the biological treatment system. The waste stream consisted of approximately the following:

Sodium Sulfate	10 to 15%
Sodium Chloride	10 to 12%
Sodium Salt of BSC	2 to 3%
Water	70 to 80%

Note: Last manufacture of benzenesulfonyl chloride was approximately June 1980.

5. Permethrin/Cypermethrin are two generations of synthetic pyrethroid insecticides which have been manufactured with a 75% stream factor during the period of 1980 to the present. Due to the highly fish toxic nature of synthetic pyrethroids, all waste from this process goes to deep well disposal. Over the years, four disposal facilities have been used: Clean Land, Air, and Water, Inc. (now Rollins Environmental) in Louisiana; Chemical Resources, Inc., Tulsa, Oklahoma; CECOS International, Odessa, Texas; and Gibraltar, Winona, Texas.

A typical analysis for this wastestream is as follows:

<u>Parameter</u>	<u>Permethrin</u>	<u>Cypermethrin</u>
pH	10	9.5
Flash Point	45 F	80 F
Sodium Chloride	6.7%	9.3%
Sodium Sulfate	1.8	1.9
Sodium Cyanate	---	1.8
Sodium Hypochlorite	---	Less than 0.1
Methanol	2.1	---
Toluene	7.7	---
Tenneco 500	---	6.9
Water	80.1	80.1
Specific Gravity	1.07	1.08
Miscellaneous Organics	1.6	1.2

6. SCI. An alkylated phenol has been manufactured under a toll conversion contract since 1982 operating for about four months per year. The process alkylates para-secondary butyl phenol to form 2,6-di-tert-butylphenol. Three streams are generated with one being recycled back to the process along with laboratory samples: (1) An aqueous wash is generated and treated in the biological treatment system.

COD	58,000 mg/liter
pH	4.1
Flash Point	Greater Than 140 degrees F
Alkylated Phenols	24,000 mg/liter
Water	97%

(2) After alkylation, a distillation purifies the product. A forecut containing un-alkylated material is recycled into subsequent process reactions. (3) Distillation bottoms containing tri-alkylated phenol and impurities is either returned to the client company for further processing or shipped off-site for incineration. This stream is non-hazardous containing no listed wastes.

pH	7.0
Specific Gravity	0.8535
Flash Point	Greater than 150
Monoalkylated phenols	0.5 %
Dialkylated phenols	2.5
Trialkylated phenols	97

7. Arsenical herbicides. From 1983 through 1985 a variety of arsenical herbicides were formulated and packaged. Products included: MSMA, DSMA, VERSAR-600, VERSAR-660, Bolls-Eye, Broadside, and Phytar-560. A formulation and packaging waste was generated in washing equipment and containers. The majority of this was recycled into formulations until the end. Final washings were disposed off-site by deep-well injection.

pH	7.3
Density	8.6 lbs/gallon
MSMA/DSMA/Cacodylates	0.5 to 1.0 %
measured as Arsenic	0.1 to 0.5 %
Suspended Solids	500 to 600 mg/liter
Water	98 to 99 %

8. MTPO. Methylthiopinacolone oxime is an organic intermediate for export manufactured under a toll conversion contract. The manufacturing process is a two step reaction sequence where each step produces a wastestream. (1) The first step produces an aqueous, reactive stream containing methyl mercaptide. This stream is treated in the manufacturing process with sodium hypochlorite until all mercaptide is converted to sulfate. The resulting stream is classified non-hazardous and is treated in the biological treatment system.

pH	6 to 10
Flash Point	greater than 140 F
Methyl Mercaptide	non-detectable
MCP and MTP	Less than 0.1%

(2) The second process step produces a stream which is non-hazardous and is also treated in the biological treatment system. A scrubber liquor containing sodium hypochlorite is used in the neutralization of the first stream and consequently goes to the biological treatment system.

pH	6 to 10
Flash Point	Greater than 140 F
MCP/MTP/MTPO	Less than 0.1%

9. RP-15 was a chemical intermediate manufactured from Sept. 1986 through Dec. 1986. The process generated an aqueous waste categorized by its m-Cresol content. The pH was maintained above pH 11 in order to keep the m-Cresol in solution as the potassium salt. For this reason the wastestream was also categorized as RCRA corrosive. The waste was shipped off-site for deep-well injection disposal.

pH	11 to 13
Flash Point	200 F
Specific Gravity	1.109
Potassium Chloride	13.3 %
Potassium Cresolate	8.0
Potassium Acetate	0.4
Dimethylacetamide	0.2
Benzotrifluoride	Less than 0.1
RP-15	1.0
Water	77.4

10. RP-10 was a technical grade herbicide manufactured under a toll conversion contract. The process entailed a nitration reaction generating a spent sulfuric acid. This acid was returned to Stauffer Chemical where it was recycled into fresh sulfuric acid.

Sulfuric Acid	60 %
Acetic Acid	25
Nitric Acid	Less Than 1
Ethylene Dichloride	Less than 1
RP-10	Less than 0.1
Water	15

A wash step following the nitration generated an aqueous weak acid which was neutralized in the manufacturing process. The resulting non-hazardous waste was then transferred to the biological treatment system.

pH	6.06
RP-10 and isomers	0.20 %
Ethylene Dichloride	Less than 0.40
Sodium Acetate	6.1
Sodium Sulfate	1.1
Flash Point	Greater than 180 F
COD	25000 to 30000 mg/l

Surface Impoundment Sampling and Analysis Plan

Project: Sample and analyze all sludges, sediments, and liquids in the biological treatment system and to make a determination pursuant to 40 CFR Part 262.11 whether such materials are hazardous wastes.

Overview: The biological treatment system consists of three surface impoundments operated in series with respect to flow.

1. The initial pond, also known as the equalization basin, receives influent from the plant area through an API separator. Influent is mixed with a circulation flow through a static mixer. Potential sampling points lie in the area around this influent point. The equalization pond is equipped with four 7.5 hp Aqua-Aerobics, high-speed, floating aerators and a forced-air aeration piping network.
2. The second pond, also known as the aeration basin, is operated as a complete mix, extended aeration system. For aeration and mixing the system uses eight 7.5 hp Aqua-Aerobics, high-speed, floating aerators. Influent to the aeration basin is mixed with a circulation loop which feeds the clarifiers. Potential sampling points are the influent area and the bottom where the least mixing might occur.
3. Two chain and flight clarifiers follow the aeration basin and are operated parallel to each other. The clarifiers settle biological mass and return it as sludge to the aeration basin. Potential sampling points include the returned, biological mass and the clarifier overflow.
4. The third pond, also known as the polish pond, is designed to be a final holding area prior to discharge to the Mississippi River outfall.

Project Objective The overall scope is to sample the surface impoundment areas providing representative information concerning chemical contamination; specifically, relating to RCRA hazardous wastes and the potential for groundwater contamination. It will not be the purpose of this project to evaluate the efficiency of the biological treatment process, however information derived in the study may be useful at a later date.

Parameters to Analyze All samples collected in this project will be analyzed for the same chemical and physical parameters. These are outlined in Table 2 and include chemicals present on the plant site during the period 1980 through 1986, heavy metals, and biological system indicator parameters.

Location of Sampling Points In order to obtain a representative cross-section of the treatment contents, the following sampling points and their rationale have been developed:

- (1) Equalization basin - This pond has one influent point. The

effluent point lies at an almost maximum distance considering the rectangular shape of the pond. For this reason four bottom sediment samples taken at even intervals between the entry and exit points should exhibit a gradient of influent contamination. This pond has approximately a two month turnover in volume. One aqueous sample taken at the exit point should adequately represent contamination of the entire pond contents.

(2) Aeration basin and clarifiers - The design criteria for the aeration system in the aeration basin is that for a complete mix system. An aqueous sample from the pond and a return sludge sample from the clarifier should adequately represent the chemical and physical content of the extended aeration system.

(3) Polish Pond - The final area prior to discharge to the Mississippi River has its entry and exit points on opposite sides. A bottom sediment sample from the entry side will indicate settled solids from clarifier overflow and one collected close to the exit will indicate most closely effluent to the river.

In summary, seven bottom sediment and/or sludge samples and two aqueous samples will be collected and analyzed. This should be adequate to establish a baseline of the treatment system quality and consequently an indication of potential ground water contamination. (See attached drawing)

Sample Types All sludge, bottom sediments, and aqueous samples will be collected as grab samples. Sludge and bottom sediment samples will be collected utilizing a vacuum cleaner technique; A rake device connected to a peristaltic pump will collect sediments by suction or a bucket drag method.

Volume of sample and container type Quantity of sample and material of container will depend on the parameters to be analyzed. Quantity of sample will be itemized by the laboratory prior to date of sampling. Container materials will be those as listed in the Federal Register on the date of sampling. Containers of appropriate materials and quantities will be provided by the laboratory.

Preservation and handling of samples Appropriate preservatives and preservation techniques used will be those defined by the Federal Register on the date of sampling. A chain of custody form will be completed for each sample collected.

Laboratory Sorrells Research, Inc. has been chosen to perform sampling and laboratory analysis. A summary of their services is attached.

TABLE I - Analytical ParametersGeneral Parameters

pH
Flash Point
COD
Total Solids
Total Suspended Solids
Total Volatile Solids
Alkalinity
Ammonia-Nitrogen
Nitrate-Nitrogen
Nitrite-Nitrogen
Sulfate
Sulfide
Sulfite
Cyanide
Chloride
Arsenic
Phosphorus, Total
Total Organic Carbon
Total Organic Halogen

Metals

Aluminum
Cadmium
Chromium
Lead
Mercury

Organic

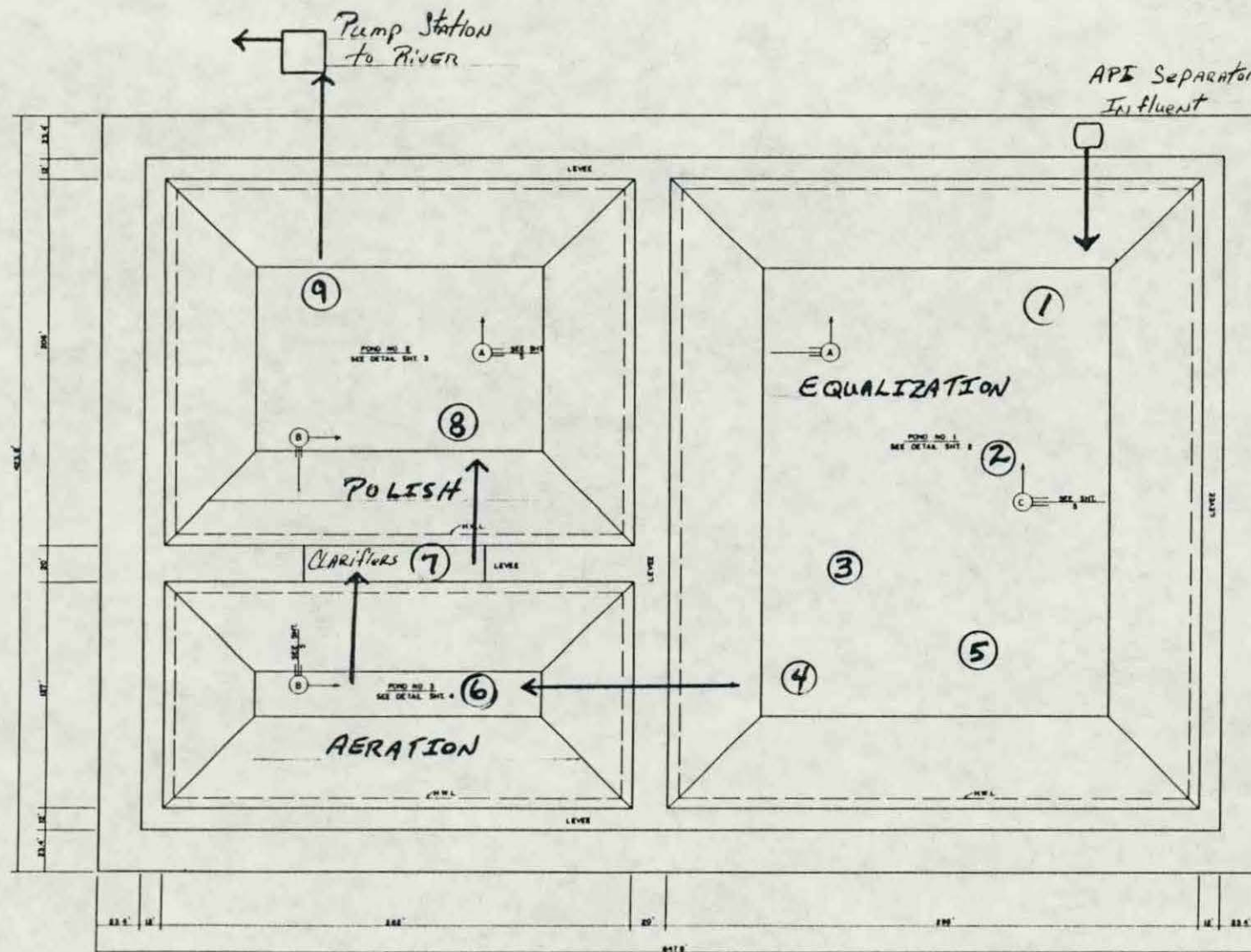
Ethylene Dichloride
Methyl Isobutyl Ketone
Mesityl Oxide
Toluene
Xylene
3,4-Dichloroaniline
Phenol(s)
Isophorone
Dimethyl Acetamide
Propanil

Sampling Schedule

Sep. 16, 1987: Submit proposed schedule of implementation
Oct. 1987: Receive plan approval from ADPC&E
Nov. 4, 1987: Collect samples from surface impoundments

Receive Analysis from Laboratory

Submit report of all laboratory data and determinations within 30 days of laboratory report.



Proposed Sampling Points
SEP 1987
J. Porter

NOTE:
ALL PUMPS ARE TO BE LINES
(SEE DETAIL SHEET 5)

EAGLE RIVER CHEMICAL CORP. EFFLUENT PONDS WEST HELENA, ARKANSAS		(PLAN)
CLINE-FRAZIER CONSULTING ENGINEERS		
PROJECT CITY	SCALE	DATE
WEST HELENA	1" = 30'	OCTOBER, 1975
DESIGNED BY	APPROVED BY	
FEW		



CHEMISTS
ECOLOGISTS
CONSULTANTS
PLANNERS



SORRELLS RESEARCH
LABORATORY AND FIELD SERVICES

8002 STANTON ROAD
LITTLE ROCK, ARKANSAS 72209

WPCF



(501) 562-8139

We participate in the Environmental Protection Agency's Quality Assurance Program, namely WPO08 to (most recently) WPO18. In addition we subscribe to an independent reference Standards Service from Environmental Resource Associates.

We perform each test according to Environmental Protection Agency test methods, reference Federal Register, Friday October 26, 1984, part VIII, 40 CFR part 136, as subsequently corrected.

We certify that we will provide well-documented reports based on information received from the Chain of Custody Sheet or Identification Card.

We certify that we will maintain records and reports of each sample analysis for at least three years.

We certify that we are able to vindicate our analytical accuracy to disputed parties or if subsequent litigation results.

We certify that we will perform all pollutant analyses at our laboratory and thoroughly exercise written chain-of-custody procedures.

We certify that we are equipped for and are capable of field monitoring.

K. E. SORRELLS RESEARCH ASSOCIATES, INC.

LABORATORY AND FIELD SERVICES

CHEMISTS
ECOLOGISTS
CONSULTANTS
PLANNERS

8405 A STANTON ROAD
LITTLE ROCK, ARKANSAS 72209

(501) 562-8139

TECHNICAL ASSISTANCE, APPLIED RESEARCH, AND BASIC RESEARCH

Analytical Chemistry
Industrial Water
Industrial Wastewater
Treatment

Stream Ecology
Domestic Water
Domestic Wastewater
Technology

ENVIRONMENTAL SERVICES

Environmental Chemistry
Limnological Studies
Resource Development
Expert Witness
Training Programs
Programs Development
Process Evaluation
Pollution Control Selection

Ecological Studies
Project Management
Materials Testing
Technical Manual Preparation
Quality Control Assistance
Equipment Evaluation
Resource Recovery Studies
Waste Evaluation

SERVICES FOR

State Governments
Federal Agencies
Development Districts
Subdivisions
Business Developments
Parks
Civil Engineers
General Public

Local Governments
Municipalities
Improvement Districts
Mobile Home Parks
Truck Stops
Recreational Developments
Sanitary Engineers
Private Organizations

SCHEDULE OF SERVICES

We are striving to be your number one environmental laboratory in this area. Our professional interests are to serve you better, with the best quality assurance and report information available!

NPDES ANALYSIS PACKAGE DOMESTIC WASTEWATER

Biochemical Oxygen Demand
Total Suspended Solids
Fecal Coliform
pH and/or Alkalinity
Flow-calculated from measured daily flow

We offer same day analyses or on-site analyses for critical analytes.

We have scheduled sample transportation services each Wednesday and Thursday serving your respective geographic areas

If you are not presently doing so, please consider using us for your outside laboratory contracts. If price is a problem, discuss it with us. We will meet the price of any quality laboratory you are presently using!

Laboratory Set-up and Operator Training, Field & Stream Studies, Bioassay, Environmental Impact Assessment, Preparation for litigation

Benchwork, Library Work, Literary Research

INORGANIC NONMETALLIC CONSTITUENTS:

Chloride
Cyanide
Fluoride
Oxygen Dissolved
Silica
Sulfate
Sulfite

METALS ANALYSIS BY ATOMIC
ABSORPTION SPECTROPHOTOMETRY:

Carbon-		
Antimony	Iron	Potassium
Bismuth	Lead	Silver
Cadmium	Lithium	Sodium
Calcium	Magnesium	Strontium
Chromium	Manganese	Thallium
Cobalt	Nickel	Vanadium
Gold	Palladium	Zinc
.....		

METALS ANALYSIS BY HTAAS:

Aluminum	Boron	Vanadium
Barium	Molybdenum	Titanium
Beryllium	Tin	Zirconium
.....		

METALS BY FLAMELESS AAS:

Arsenic Mercury Selenium
Turbidity.....

*EP TOXICITY.....

**Trihalomethanes.....

***Daphnia Toxicity Screen
Daphnia 48-hr. TLM.....

*Many cities are requiring this procedure before allowing
waste to be disposed of in their landfills.

**We provide sample containers & preservatives on request.

***E.P.A. requires this of certain Industrial discharges.

ORGANIC CONSTITUENTS:

Gas Chromatograph Screening
GLC - Wastewater (Priority
Pollutants Methods)
BOD

COD
Oil & Grease
Phenols
Surfactants
Total of Soluble Organic

-- Potable Water
-- Wastewater

NUTRIENTS:

Ammonia Nitrogen, Distilled
Nitrate + Nitrite Nitrogen
Total Kjeldahl Nitrogen
Phosphorus

PHYSICAL EXAMINATION:

Color.....
Conductivity.....
Hardness.....
Total Solids.....
Total Dissolved Solids.....
Total Suspended Solids.....
Total Volatile Solids.....

.....

Amenable Cyanide.....
Asbestos.....

Flashpoint.....

PCB'S

Transformer Oil.....
Water/Sediment/Sludge....
Animal Feed.....
Paper.....

RCRA HAZARDOUS

Waste Testing

Ignitability.....
Corrosivity.....
Reactivity....

Mineral Analysis Package.....

Bromide.....

ORGANIC CONSTITUENTS

TOX (Total Organic Halides).....

% Moisture

Settleable Solids.....

PRIORITY POLLUTANTS

(129) Priority Pollutants
Organic Only.....
Volatiles.....
Toluene.....
Base/Neutral.....
Pesticides.....
Polynuclear Aromatic Carbons..

Phthlate.....
Acid Extract.....
Metals (13).....
PCB'S.....
Phenols.....

T.T.O.....

Formaldehyde

Water.....
Air.....
(chg per hour + mileage)....

EQUIPMENT

TRACOR 560 TEMPERATURE-PROGRAMMABLE GAS-LIQUID CHROMATOGRAPH
Detectors: Flame Ionization Detector, Hall Electrolytic
Conductivity. Detector with multi-mode operational capabilities
including Halogen-selective, Nitrogen-selective,
Nitrosamine-selective, or Sulfur-Selective mode.
Linearized Electron Capture Detector. Capillary On-column
injector.

GC/MS SYSTEM: Hewlett Packard 5890 Gas Chromatograph with
Mass Selective Detector, Controller HP 310 MicroComputer
configured as the HP 59970 MS ChemStation.

STOCK COLUMNS

25 m capillary vit-silica SE-52 WCOT
25 m capillary vit-silica PH-5 WCOT
25 m capillary vit-silica ULTRA-2 WCOT

2 m packed Columns, Glass:

DV-1 (2) 2% SP2300/3% SP2310
(2.4 m) 1% SP-1000 on Carbowax B (2)
5% SP-1200/1.75% Bentone 34
1% SP-1240-DA
1.5% SP-2250/1.95% SP-2401
10% Carbowax 20 m/2% KOH
3% SP-2250 1% DEXSIL 300
3% SP-1000
1.5% DV-1/1.5% DC-225
80/100 Chromosorb 101
10% DEGS-PS

TEKMAR LSC-2 PURGE-AND-TRAP CONCENTRATOR with absorbent trap
for EPA Methods 601, 602, and 603. Operates as master to GC
plotter integrator.

HEWLETT-PACKARD 3390-A PLOTTER-INTEGRATOR

DOHRMAN DC-80 TOTAL ORGANIC CARBON ANALYZER

SEQUOIA TURNER MODEL 390 SPECTROPHOTOMETER

INSTRUMENTATION LABORATORY MODEL IL 251 ATOMIC
ABSORPTION/EMISSION SPECTROPHOTOMETER. Double-beam with
background correction.

Stock Hollow-Cathode Lamps:

Aluminum	Antimony
Arsenic	Barium
Beryllium	Bismuth
Cadmium	Calcium
Cobalt	Chromium
Copper	Deuterium
Gold	Iron
Lithium	Lead
Magnesium	Manganese
Mercury	Molybdenum
Nickel	Palladium
Potassium	Selenium
Silver	Sodium
Strontium	Tellurium
Thallium	Tin
Titanium	Vanadium
Zinc	Zirconium

TWO APPLE II-PLUS MICROCOMPUTERS with Disk Drives and EPSON FX
Printers.

MACINTOSH MICROCOMPUTER with Disk Drives and Apple Imagewriter
Printer.

TWO APPLE IIE MICROCOMPUTERS WITH Duo-Disk Drive and
enhancements.

PHYSICAL PLANT

4,000 square feet of laboratory, office, and storage space on a
2.5-acre wooded site in the center of Pulaski County, Arkansas.

Sensitive instrumentation and Standards Preparation area is
isolated from Wet Chemistry/Extractions areas.

CSN: 546068 Permit No. _____
Media: Air, Water, Solid, Hazardous
Sort: _____
CEDAR CHEMICAL CORPORATION

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

Karen
#10
OCT 15 1987

REPLY TO: P. O. BOX 2749
WEST HELENA, AR 72390
(501) 572-3701

Sept. 14, 1987

Karen Deere
Arkansas Department of Pollution Control & Ecology
8001 National Drive - P.O. Box 9583
Little Rock, Arkansas 72209

Re: Consent Administrative Order: LIS 86-027

Dear Karen:

Pursuant to paragraph 6 of the Consent Administrative Order, Cedar Chemical Corporation is submitting a closure plan for the hazardous waste storage facilities.

We are prepared to implement this plan upon approval by the Department. We anticipate that this plan should adequately satisfy the requirements of both the Consent Administrative Order as well as those of the RCRA regulations.

We look forward to hearing from you.

Sincerely,

*T-2105
not included*


Joe E. Porter
Environmental Engineer

cc: J.H. Miles
G.L. Pratt
A.T. Malone

Overview

The following is a written closure plan for tank storage facilities and container storage facilities located at Cedar Chemical Corporation, West Helena, Arkansas. The closure plan follows the guidelines and requirements set forth in CFR 40, Part 265 and adopted by reference in the Arkansas Hazardous Waste Management Code. This closure plan is notification that Cedar Chemical Corporation is ceasing to conduct regulated activities of tank storage and container storage. The facility will retain its' status as a hazardous waste generator with EPA ID Number ARD 990 660 649.

The facility currently has one (1) storage tank and a container storage area classified as Hazardous Waste Management Units. Each unit is addressed separately in the following plan. When the plan for each unit is complete, it will constitute final closure. Post-closure care is not a requirement of the closure plan.

Tank Storage

Maximum inventory for tank T-B112 is assumed to be the capacity of the tank, 20,000 gallons. The tank served to manage a D002, corrosive, waste. The last shipment of this waste was made to Rollins Environmental Services, Baton Rouge, La., in March, 1987. A total of 43,000 gallons was removed from the tank in March 1987. Manifests and shipping records are available for documentation.

A cleaning plan has been developed which includes elementary neutralization of any remaining tank contents and a thorough washing with copious volumes of water. After the neutralization

wash and each rinse, the tank contents will be examined analytically for the parameter of pH. Elementary neutralization may be required to bring the pH into an acceptable range. When within the range of non-hazardous waste criteria, the wash will be discharged from the tank to the on-site biological treatment system.

Associated Equipment. All piping and the pump connected to the tank will be treated in the same way. The pump and piping will be used to circulate the tank contents when washing. No brushes, shovels, or other tools will be used to clean the tank. The tank will not be dismantled, removed, or otherwise disposed of. Therefore no other equipment requires decontamination.

Containment Area. The containment area consists of a concrete floor and surrounding concrete walls. The internal dike area will be washed using a detergent solution in a high pressure washer. Washwater will be tested analytically for the parameter of pH. When within the range of non-hazardous waste criteria, the wash will be discharged from the diked area to the on-site biological treatment system.

Sampling Procedures. Washes and rinsates of the tank and its surrounding concrete dike will be sampled as grab samples in glass containers. Samples will be hand-carried to the plant laboratory and analyzed. Analysis will take place within one hour of sampling. Results will then be immediately available. Samples will be taken from the tank and/or the tank dike immediately prior to removal of any wash or rinsate. No removal will be made until results have demonstrated that the wash or rinsate is non-hazardous.

Testing Parameters. Analytical criteria for decontamination will be the value of pH. The pH value of all washes or rinsates must be in the range of pH 5 to pH 10 prior to removal and discharge to the biological treatment system.

Analytical Method. The parameter of pH will be determined in accordance with the analytical method outlined in "Test Methods for the evaluation of Solid Waste: Physical/Chemical Methods," SW-846., and "Standard Methods for the Examination of Water and Wastewater", 16th Edition.

Certification. The tank and its surrounding concrete dike will be visually inspected by the Environmental Engineer and a Professional Engineer registered in the State of Arkansas. Laboratory analysis will be examined by the Laboratory Manager, the Environmental Engineer and a Professional Engineer. Upon satisfaction of these parties that the tank is clean and does not contain hazardous waste, the Professional Engineer will provide written certification to the company. A copy of this certification will be included with notice to the State of Arkansas that the tank closure is complete within 60 days of completion of closure.

Subsequent to final closure, this tank will be placed back into service as a wastewater holding tank. Manifests, shipping records, and plant operating records will demonstrate that the tank will not be used for hazardous waste storage longer than 89 days.

Container Storage

The container storage area for hazardous waste in drums consists of a concrete slab with center drain and a collection sump. The concrete area is surrounded by an asphalt work area and is sheltered by an aluminum roof structure.

Current (Oct 12, 1987) inventory consists of ignitable (D001) and F005 (Toluene greater than 10%) hazardous waste. These will be removed within 90 days of plan implementation. Disposal will be off-site to a commercial incinerator facility.

Once the current inventory of hazardous waste is removed, the area will be cleaned using a detergent solution in a high pressure washer. Washwater will be tested analytically for the parameters of pH and flash point. When within the range of non-hazardous waste criteria, the wash will be discharged from the sump to the on-site biological treatment system.

Containment Area and Equipment. The asphalt area surrounding the concrete slab and the concrete sump will be cleaned in the same manner as the concrete area. If any shovels or brushes are used to facilitate cleaning, they will be washed before they leave the area. All washes will be tested for the parameters of pH and flash point. Washes will then be discharged to the biological treatment system.

Sampling Procedures. Washes and rinsates from the drum storage area will be sampled as grab samples in glass containers. Samples will be hand-carried to the plant laboratory for analysis. Analysis will be performed within one hour of sampling. Discharges from the area will not be made prior to receipt of analytical results, demonstrating that washes are non-hazardous.

Testing Parameters. Analytical criteria for decontamination will be the value of pH and flash point. The pH value of all washes must be in the range of pH 5 to pH 10. All flash point values must be greater than 140 degrees F. These values will be documented prior to removal and discharge of washes to the biological treatment system.

Analytical Methods. Parameters of pH and flash point will be determined in accordance with analytical methods outlined in "Test Methods for the Evaluation of Solid Waste: Physical/Chemical Methods", SW-846.

Certification. The drum storage area will be visually inspected by the Environmental Engineer and a Professional Engineer registered in the State of Arkansas. Laboratory analysis will be examined by the Laboratory Manager, the Environmental Engineer, and a Professional Engineer. Upon satisfaction by those parties that the drum storage area is clean and does not contain hazardous waste, the Professional Engineer will provide written certification to the company. A copy of the certification will be included with notice to the State of Arkansas that the storage area closure is complete within 60 days of completion of closure.

After final closure of the drum storage area, the area will be used to manage containerized, hazardous waste with less than 90 days of storage. A containerized waste management program will document containers placed in the area. A monthly inventory will be conducted and manifests/shipping records will indicate movement and disposal.

Closure Cost Estimate

T-B112 Storage Tank

Tank Cleaning - 48 man hours @ \$15.00	\$ 720.00
Tank Dike Cleaning - 32 man-hours @ 15.00	480.00
Wash Neutralization and disposal (on-site)	1000.00
Third party supervision	1200.00
Laboratory Analysis	1000.00

Container Storage Area

Hazardous Waste Inventory disposal (off-site)	16000.00
Concrete slab and pump cleaning - 72 hours @ 15.00	1080.00
Third party supervision	900.00
Laboratory Analysis	1000.00

Certification

Professional Engineering Services	2500.00
-----------------------------------	---------

\$24980.00



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

Karen

CERTIFIED MAIL #P 291 319 027
RETURN RECEIPT REQUESTED

PHONE: (501) 562-7444

August 20, 1987

Mr. Joe Porter
Environmental Engineer
Cedar Chemical Corporation
Post Office Box 2749
West Helena, Arkansas 72390

Dear Joe:

RE: Consent Administrative Order

The Department has received and reviewed your correspondence dated August 11, 1987 submitted pursuant to paragraph 4 of the Order.

The inspection plan and log sheets are generally very well developed and easy to interpret. However, the following items as required by 40 CFR 265.15 were omitted:

1. The inspection plan fails to address the safety and emergency equipment (such as fire extinguishers, eye wash, etc.).
2. The inspection log fails to include space for documentation of the date and nature of repairs or remedial action.

The above deficiencies must be corrected to fulfill the requirements of paragraph 4 of the Order. Therefore, please resubmit, within thirty (30) days of the date of receipt of this notice of deficiency, an amended plan which corrects these omissions.

If you have any questions, please feel free to call.

Sincerely,

Karen Deere
Manager, Enforcement Branch
Hazardous Waste Division

KD:lms

cc: Phil Deisch, Chief Counsel, Legal Branch
John Miles, Plant Manager, Cedar Chemical Corp.
Sammy Bates, Hazardous Waste Inspector, HW Division

Cedar Chemical

2/27/87

Tech Neglo

- Difficulty in provide parameters for pre-11/19/80 waste (historic waste characteriz)

- We Draft CAO > Cedar - 2-3 wks

- address compliance efforts

- pH control of propenil plant

- storage area

- ~~go~~ vol. to include old S, I,

leave & Blank

pull FIT Report on old pond ->
possibly of inclusion in CAO

CEDAR CHEMICAL CORPORATION

One Greentree Centre • Suite 201 • Marlton, NJ 08053 • 609-596-8488

RON CHEVES

VICE PRESIDENT

CORPORATE HEADQUARTERS

24th Floor • 5100 Poplar Avenue • Memphis, TN 38137 • 901-685-5348

Cedar Cham.

Pre Mtg Review - 2/24/87 Ltr

Part A ① - Proposal for expansion include historical activities prior
to Nov. 19, 1980?

- Need explanation of changes made in Propanil plant

~~Improved Inspection program~~ → ADP review + approval

② - HW determination → submit for ~~four~~ files

Part B ① ✓

② -

3

4

⑤ - Monitoring ~~will~~ ^{waste mgt.} should include activities prior to 11/19/80

⑥ - gwm results w/in 15 days of receipt

⑦ - Need a schedule of activities for 0

separate

{ Need AHA re: Fin. Ass (Liability) Insur)
if V will propose CAD / if not NOV or Pandt

Vertac / Cedar Chem

1/6/87

Jeff Pratt, Joe Porter, Allen Malone
Karen Deere, Bob B., Phil D.,

Salmo Seal
Bentley
78
- Problem with ponds from one process

- * pond is lined
- propionic acid → spelled wrong in report
- process malfunction → thermocouple screw up
 - tried to adjust w/ caustic → overcompensated "on occasion"
- neutralizing in receiving vessel (~1000 gallons)
 - prior to going to ponds

→ propose to:

- ① inc. capacity of rec. vessel
- ② controls to prevent release of pH problem to SI.

Drum Storage

- Inspects for leaks & spills
- not sump & pump

→ No mechanism under RCRA for notifying of upset

→ Nov. 84 ltr → ~~at~~ pond withdrawal would allow to GW monitor upgrade -
→ has not been done to date

→ reduction of 90 time ~~loss~~

- Liability Insurance?

- Penalties

→ C/O Neg.

- stop doing it document not do it anymore
- Waste character. (present time)

** → When will H₂O permit expire?

- possibly add gwm on renewal -



File

ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

MEMORANDUM

CSN: 54-068 Permit No. _____
Media: Air, Water, Solid, Hazardous
Sort: Permit, Compliance, Legal, Misc.

TO: Bob Blanz, Ph.D., Deputy Director
THROUGH: John D. Ward, Chief, Hazardous Waste Division *JW*
FROM: Mike Bates, Chief, Enforcement Branch, HW Division *WB*
DATE: August 14, 1986
SUBJECT: Request for Case Referral

The Hazardous Waste Division (HWD) conducted a routine inspection at Vertac Chemical Corporation in West Helena on May 30, 1986. The inspection revealed several violations of the hazardous waste management regulations. The most significant relates to the equalization lagoon on-site utilized as part of the biological treatment system prior to wastewater discharge through a NPDES outfall.

The above referenced pond was formerly classified as a hazardous waste unit by Vertac in November of 1980. Vertac, in a letter dated November 1, 1984, stated that a re-evaluation of the status of the impoundment indicated it was not regulated as hazardous waste unit. Vertac subsequently submitted documentation that influent to the ponds exceeded the conditions to be considered hazardous on only one occasion. The Department responded to Vertac's November 1, 1984 letter on November 16, 1984 by withdrawing the impoundments from the RCRA regulated universe.

The inspection of May 30, 1986 revealed that Vertac had experienced thirteen (13) excursions into the hazardous waste range of pH values from the period between January 3, 1986 through April 18, 1986 for the influent to the ponds referenced above. Subsequent to the May 30th inspection, the HWD requested the influent monitoring logs for 1984 and 1985. Review of the 1984 and 1985 logs revealed five (5) excursions into the hazardous pH range between November 1984 and December 1985.

Based on the above information it is clear that Vertac/West Helena has added hazardous waste to their surface impoundments since the impoundment was removed from their interim status operating authority in November 1984. This being the case, Vertac/West Helena is once again considered to be a land disposal facility.

Prior to the removal of the surface impoundment from the system as a hazardous waste impoundment the Department attempted to conduct a comprehensive groundwater monitoring evaluation. The major finding of the evaluation (conducted August 1984) was that an adequacy determination could not be made due to the unavailability of hydrogeologic and well construction data. Vertac admitted that their groundwater monitoring plan was not in compliance in 1984 (see letter dated November 1, 1984 from Vertac to John Ward, ADPC&E).

Page Two

Memorandum to Bob Blanz from Mike Bates

Subject: Request for Case Referral - Vertac, West Helena

August 14, 1986

The facility submitted their Part B application in 1984., The application was deemed substantially complete on January 29, 1985. The application is now awaiting technical review. Due to the facts stated above the Part B will have to have a major revision to include the surface impoundment.

Other vioaltions discovered during the May 30, 1986 inspection are as follows:

1. 40 CFR 265.31 - Failure to maintain and operate the facility to minimize the possibility of any sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. This is evidenced by the drum storage area sump which was full and had overflowed and the associated sump pump was inoperative.
2. 40 CFR 265.15 - Inadequate inspection log and associated inspections and records.
3. 40 CFR 265.15 - Failure to identify spills and conduct corrective action.
4. 40 CFR 262.11 - Failure to identify waste as hazardous. This is evidenced by Vertac's failure to properly identify and handle the corrosive hazardous waste going into the surface impoundment.
5. 40 CFR 265 - Failure to comply with interim status standards in regard to operation of the surface impoundment.
6. Arkansas Hazardous Waste Management Act Section 5 - Operation of a hazardous waste management facility without a permit.

Vertac should be required to bring the impoundment into compliance with the RCRA regulations, including groundwater monitoring requirements and also remedy the other violations.

The violations committed by Vertac are classified as High Priority. The proper enforcement response, therefore, is the issuance of a Notice of Violation (NOV). I have taken the liberty to draft a NOV which incorporates the Hazardous Waste Division's recommendations for corrective action and penalty. By this memorandum I am requesting that this case be referred to the Legal Section for finalization an issuance of the NOV.

Please advise if clarification or additional information is needed.

MB:lms

RCRA COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST

Note: On multiple part questions, circle those not in compliance.

Section A - EPA Identification NO.

1. Does Generator have EPA I.D. NO.? (262.12 - EPA I.D. No.) ☒ Yes ☐ No

a. If yes, EPA I.D. No. ARD990660649

Section B - Hazardous Waste Determination

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste)

a. If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste No.)

☒ Yes ☐ No

See attachment
(Provide waste name and description.)

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous waste.)

☒ Yes ☐ No

a. If yes, list wastes and quantities on attachment. (Include EPA Hazardous Waste No.) (Provide waste name and description)

See attachment
b. Does generator determine characteristics by testing or by applying knowledge of processes? Testing

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)?

☒ Yes ☐ No

2. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes deemed non-hazardous generated by generators? (i.e. process waste streams, collected matter from air pollution control equipment, water treatment sludge, etc.)

☒ Yes ☐ No

a. If yes, did generator determine non-hazardous characteristics by testing or knowledge of process?

Testing

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)?

☒ Yes ☐ No

2. If equivalent test methods used, attach copy of equivalent methods used.

b. List wastes and quantities deemed non-hazardous or processes from which non-hazardous wastes were produced. (Use narrative explanations sheet.)

See attachment

4. Are any wastes recycled, reused or reclaimed on-site?

☐ Yes ☒ No

If yes, use narrative to describe the type and quantity of the waste and the method used for reclamation.

- ☒
- Yes
- ☐
- No

5. Does generator retain copies of manifests?

☒ Yes ☐ No

manifests were inspected, how many violations were noted and the type of violation.) *no manifests were checked, no violations were noted*
If yes, complete a through e. If questions contain more than one item, circle those not in compliance. (263.23 Use of the Manifest)

- ☒ Yes ☐ No

- ☒ Yes ☐ No

- ✓ Yes No

- ✓ Yes No

- W/A
-
- Yes No

- h/A
- Yes No

W/A

~~Yes~~ No

- ☒ Yes ☐ No

Site Name: Ventac
 I.D. Number: W. Helena
ARD 990660649
6-5-86

Section D - Pre-Transport Requirements

1. Does generator package waste?

☒ Yes ☐ No

If no, skip to question 9.

If yes, complete the following questions.

Inspect containers ready for immediate shipment. If there are no such containers, skip to question 8.

have ready for shipment

2. Does generator package waste in accordance with 49 CFR 173 178, and 179? (DOT requirements) (262.30 - Packaging)

☐ Yes ☐ No *h/A*

3. Are containers to be shipped leaking or corroding or bulging?

Use narrative explanations sheet to describe containers and condition.

☐ Yes ☐ No *h/A*

4. Does the generator use DOT labeling requirements in accordance with 49 CFR 172 when containers are offered for shipment? (262.31 - Labeling)

☐ Yes ☐ No *h/A*

5. Does the generator mark each package in accordance with 49 CFR 172 when containers are offered for shipment? (262.32 - Marking)

☐ Yes ☐ No *h/A*

6. a. Is each container of 110 gallons or less marked with the following label when containers are offered for shipment?

☐ Yes ☐ No *h/A*

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address *W. Helena*

Manifest Document Number *W. Helena*

- b. If other labels exist, list in narrative.

7. If there are any vehicles present on-site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet.

None on site

8. Satellite Accumulation (effective June 20, 1985)

- a. Does the generator accumulate waste in containers at or near "satellite" generation points?

☐ Yes ☒ No

If no, skip to question 9.

If yes, complete the following.

- b. Are containers in good condition? ☐ Yes ☐ No
- c. Is the waste compatible with the containers? ☐ Yes ☐ No
- d. Is waste transferred from leaking containers or otherwise managed to control leakage? ☐ Yes ☐ No
- e. Are containers closed? ☐ Yes ☐ No
- f. Are containers marked with the words "hazardous waste" or identification of the contents? ☐ Yes ☐ No
- g. Has waste accumulation exceeded one (1) quart of acutely hazardous waste (261.33 e.) or 55 gallons of other hazardous waste? ☐ Yes ☐ No

If yes,

1. Has the container holding the excess amount been marked with the date the excess began accumulating? ☐ Yes ☐ No
2. Have excess amounts remained in the satellite accumulation area longer than three (3) days? ☐ Yes ☐ No

9. Accumulation Time (262.34 - Accumulation Time)

- a. Is the site a permitted/interim status storage facility? ☒ Yes ☐ No

If yes, skip to Section E, and complete and attach the TSD checklist and appropriate supplemental checklists. If no, answer rest of question #9.

- b. Is hazardous waste shipped offsite within 90 days? ☐ Yes ☐ No
- c. Is waste stored in containers or tanks? ☐ Yes ☐ No
- d. Is the beginning date of accumulation time clearly indicated on each container? ☐ Yes ☐ No
- e. Is each container or tank marked with the words "Hazardous Waste"? ☐ Yes ☐ No
- f. Complete and attach the containers/tanks supplemental checklists as appropriate.
- g. If generator accumulates waste on-site for less than 90 days, complete RCRA Generators Checklist Supplement.

1. Is generator keeping the following reports for a minimum of three (3) years? (262.40 - Recordkeeping)

- a. Manifests and signed copies from designated facilities? ✓ Yes No
- b. Biennial reports (or reports as required by state agencies) ✓ Yes No
- c. Exception Reports Yes No *h/PA*
- d. Test results, where applicable. ✓ Yes No

2. Where are records kept (at facility or elsewhere)? Facility

3. Who is in charge of keeping the records? Name Joe Porter Title Environmental Engineer

Section F - Special Condition

1. Has generator received from or transported to a foreign source any hazardous waste? (262.50 - International Shipments)

If yes,

- a. Has a note been filed with the R.A.?
- b. Is this waste manifested and signed by Foreign Consignee?
- c. If generator transported wastes out of the country has he received confirmation of delivered shipment?
- d. Has the generator filed an annual report (by March 1 of each year) giving the type, quantity, frequency and destination of all exported hazardous waste?
(Per HSWA 1984)

Yes ☒ No

Yes ☒ No ☐

Yes ☒ No

 Yes ☒ No

☒ Yes

*San Chemical
(Vestac, West Helena)
ARD 990660649*

ARKANSAS HAZARDOUS WASTE MANAGEMENT FACILITY

Liability Insurance Coverage Checklist

1. ☒ Failure to provide ADPC&E with evidence of sudden accidental occurrences. [40 CFR 265.147(a)/264.147(a)]
2. ☐ Failure to provide ADPC&E with evidence of the required monetary amounts of coverage for sudden accidental occurrences. [40 CFR 265.147(a)/264.147(a)]
3. ☐ Failure to provide ADPC&E with evidence of nonsudden accidental occurrences by:
 - ☐ January 16, 1983 for facilities with annual sales or revenues of \$10 million or more; [40 CFR 265.147(b)(4)(i)/264.147(b)(4)(i)]
 - ☐ January 16, 1984 for facilities with annual sales or revenues of \$5 million to \$10 million; [40 CFR 265.147(b)(4)(ii)/264.147(b)(4)(ii)]
 - ☐ January 16, 1985 for all other facilities. [40 CFR 265.147(b)(4)(iii)/264.147(b)(4)(iii)]
4. ☐ Failure of an interim status facility to submit to ADPC&E a letter by January 15, 1983 stating when nonsudden accidental coverage will be obtained. [40 CFR 265.147(b)(5)]
5. ☐ Failure to provide ADPC&E with evidence of the required monetary amounts of coverage for nonsudden accidental occurrences. [40 CFR 265.147(b)/264.147(b)]
6. ☐ Failure to use the exact wording of the endorsement or certificate of liability as required by 40 CFR 265.147(a)(1)(i)/264.147(a)(1)(i) and/or 265.147(b)(1)(i)/264.147(b)(1)(i). See attached form for exact wording.
7. ☐ Failure to submit to ADPC&E the letter signed by the owner's or operator's chief financial officer. [40 CFR 265.147(f)(3)(i)/264.147(f)(3)(i)]
8. ☐ Failure to submit to ADPC&E a copy of the independent certified public accountant's report. [40 CFR 265.147(f)(3)(ii)/264.147(f)(3)(ii)]
9. ☐ Failure to submit to ADPC&E a special report from the owner's or operator's independent certified public accountant. [40 CFR 265.147(f)(3)(iii)/264.147(f)(3)(iii)]
10. ☐ Failure to submit to ADPC&E updated financial test information within 90 days after the close of each succeeding fiscal year. [40 CFR 265.147(f)(5)/264.147(f)(5)]

Other _____

*no submission
Paul DeLucca
9-29-86*

CEDAR C HENICH
ARD 990660649

FINANCIAL ASSURANCE CHECKLIST FOR CLOSURE/POST-CLOSURE

CARE OF INTERIM STATUS FACILITIES

1. ☐ Failure to provide ADPC&E with financial assurance in an amount equal to the current cost estimates or as otherwise provided for closure/post-closure as required for:
 - ☐ trust funds (40 CFR 265.143(a)(3)(i)/265.145(a)(3)(i)).
 - ☐ surety bonds guaranteeing payment (40 CFR 265.143(b)(6)/265.145(b)(6)).
 - ☐ letters of credit (40 CFR 265.143(c)(6)/265.145(c)(6)).
 - ☐ insurance (40 CFR 265.143(d)(3)/265.145(d)(3)).
 - ☐ financial test (40 CFR 265.143(e)(2)/265.145(e)(2)).
 - ☐ multiple financial mechanisms (40 CFR 265.143(f)/265.145(f)).
 - ☐ a financial mechanism for multiple facilities (40 CFR 265.143(g)/265.145(g)).
2. ☐ Failure to submit to ADPC&E updated:
 - ☐ schedule A of the trust agreement within 60 days after an increase in the amount of the current closure/post-closure cost estimates (40 CFR 265.143(a)(2)/265.145(a)(2)).
 - ☐ financial assurance covering any increase in the closure/post-closure cost estimates within 60 days after the increase as required by:
 - ☐ 40 CFR 265.143(b)(f)/265.145(b)(f).
 - ☐ 40 CFR 265.143(c)(f)/265.145(c)(f).
 - ☐ 40 CFR 265.143(d)(9)/265.145(d)(9).
 - ☐ information demonstrating that the facility meets the financial test within 90 days after the close of each succeeding fiscal year (40 CFR 265.143(e)(5)/265.145(e)(5)).
3. ☐ Failure to make subsequent payments into the closure/post-closure trust fund within 30 days after each anniversary date of the first payment in accordance with 40 CFR 265.143(a)(3)(ii)/265.145(a)(3)(ii).
4. ☐ Failure to adjust the closure/post-closure cost estimates in accordance with 40 CFR 265.142(b) and (c)/265.144(b) and (c).
5. ☒ Failure to submit the following documentation using the exact wording as modified in accordance with Section 3(d) of the Arkansas Hazardous Waste Management Code for:
 - ☒ trust agreements (40 CFR 265.143(a)(2)/265.145(a)(2)). See attached form for correct wording.
 - ☐ surety bonds guaranteeing payment (40 CFR 265.143(b)(2)/265.145(b)(2)). See attached form for correct wording.

_____ letters of credit (40 CFR 265.143(c)(2)/265.145(c)(2)). See attached form for correct wording.

_____ certificates of insurance (40 CFR 265.143(d)(2)/265.145(d)(2)). See attached form for correct wording.

_____ corporate guarantees (40 CFR 265.143(e)(10)/265.145(e)(11)). See attached form for correct wording.

6. _____ Failure to submit the following elements of financial assurance mechanisms:

_____ formal certification of acknowledgement in conjunction with the trust agreement (40 CFR 265.143(a)(2)/265.145(a)(2)).

_____ originally signed duplicate of the trust agreement in conjunction with the surety bond (40 CFR 265.143(b)(3)/265.145(b)(3)).

_____ originally signed duplicate of standby trust agreement in conjunction with the letter of credit (40 CFR 265.143(c)(3)/265.145(c)(3)).

_____ letter from the owner or operator referring to the letter of credit (40 CFR 265.143(c)(4)/265.145(c)(4)).

_____ copy of the independent certified public accountant's report in conjunction with the financial test (40 CFR 265.143(e)(3)(ii)/265.145(e)(3)(ii)).

_____ a special report from the owner's or operator's independent certified public accountant in conjunction with the financial test (40 CFR 265.143(e)(3)(iii)/265.145(e)(3)(iii)).

_____ a corporate guarantee in conjunction with the financial test (40 CFR 265.143(e)(10)/265.145(e)(11)).

7. _____ Other _____



VERTAC CHEMICAL CORPORATION

24th Floor • 5100 Poplar • Memphis, TN 38137 • 901-767-6851

REPLY TO: P. O. BOX 2648

WEST HELENA, AR 72390

(501) 572-3701

CSN: 54-0068 Permit No. _____

Media: Air, Water, Solid, Hazardous

Sort: Permit, Compliance, Legal, Misc June 20, 1986

Karen Deere
Arkansas Department of Pollution Control & Ecology
8001 National Drive - P.O. Box 9583
Little Rock, Ar. 72209

Re: Inspection Report Information

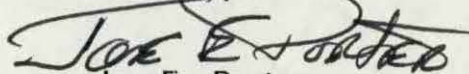
Dear Karen,

The log sheets requested are attached. If you need anything else please let me know. The pH excursions began in February 1986 when a set of thermo couple wires twisted, resulting in a distillation column running hot which in turn caused a loss of propionic acid. Column operation was erratic and inconsistent through the month of March and early April.

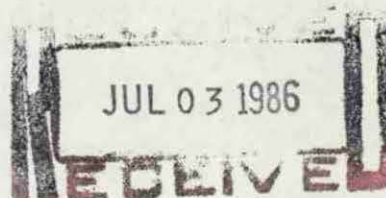
Our sampling represents only waste from our Propanil/Stam process. Due to a lack of business the only other water passing the sampling point consists of blowdown from boilers and cooling towers. The propionic acid wastestream is more concentrated now than in past years due to a switch from steam ejectors to a mechanical vacuum pump system.

We have instituted a regular, routine sampling program in our Propanil/Stam process to monitor the waste acid prior to release to the treatment system. Any material not meeting requirements will be treated prior to release. In addition, since our acid is more concentrated now (5 to 8%) recovery and recycle and may be economical.

Sincerely,


Joe E. Porter
Environmental Engineer

cc: J. W. Shackelford
J. H. Miles
C. Pace



ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

MEMORANDUM

TO : Mike Bates, Chief, Enforcement Branch, HW Division *MB*
FROM : Karen Deere, Hazardous Waste Inspector, HW Division *KD*
DATE : 10-JUN-1986
SUBJECT : Vertac - West Helena

On May 30, 1986, I conducted a routine compliance evaluation inspection on Vertac - West Helena. I was accompanied by David Morrow, Sammy Bates and Blake Tolleson. The violations found are listed below:

- (1) The sump in the drum storage area was full of water due to an inoperable sump pump. There were signs of overflow from this area. This condition is a Class I violation of 40 CFR 265.31 as the facility has not been operated and maintained to minimize the possibility of a release of hazardous waste:
- (2) The facility inspection logs do not cover the inoperable sump pump in the drum storage area. Facility personnel are unsure how long this condition has existed. This omission is a Class I violation of 40 CFR 265.15 which requires that inspections identify malfunctions, deterioration and operator error which may lead to release of hazardous constituents to the environment.
- (3) The hazardous waste drum storage area was being used as a holding area for approximately 130 drums which had been gathered from around the plant site. The facility was in the process of analyzing the waste in these drums for hazardous waste characteristics. Two of these drums contained an oily waste which had overflowed onto the ground. This is a possible Class I violation of 40 CFR 265.31 for failure to maintain the facility so as to minimize the possibility of the release of a hazardous waste. The facility had also failed to clean up the spilled material which is a possible violation of 40 CFR 265.51.
- (4) The waste water treatment system on-site handles both process and sanitary waste streams. There are three lagoons associated with this system. In 1980, Vertac sought interim status for these impoundments as a selling point for their contract chemical business. On November 1, 1984, company officials stopped classifying the lagoons as hazardous due to the following rationale: (1) the lagoons had received hazardous waste only one (pH=1.8 SU), and (2) maintaining the hazardous

waste classification was not cost effective. In a letter dated November 16, 1984 the Department officially concurred with Vertac and the lagoons were withdrawn from the current Part A. The facility chemical laboratory monitors several parameters in the lagoons as a process control method, which includes testing the pH of the influent to the system. During 1986 the facility logged 13 days where the influent pH was either less than 2.0 or greater than 12.5 SW (D002). The low pH (<2) was attributed to a defective thermocouple in the propanoic acid production process. However, the situation lasted from February 20 - April 8 and the Department received no notification of this "upset." The high pH (>12.5) can be attributed to two sources according to company officials: (1) boiler blowdown discharge which is not treated or tested before being pumped to the treatment system, and (2) the periodic over-neutralization of the propanoic acid waste stream with caustic soda which is also not tested before it becomes the influent to the treatment system. Facility personnel stated during 1984 and 1985 there were periodic high pH influent values, but no low values.

Log sheets for these years have been requested along with a description of the steps taken to identify and correct the problem causing low pH values in the influent. The facility also routinely discharges water from sumps and containment areas to the wastewater treatment system with only a visual inspection (no chemical analysis) which could contribute to the pH fluctuation of the influent. There is a groundwater monitoring system in place around the lagoons, but it does not meet RCRA requirements.

jr



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

June 10, 1986

Rec'd 6-11-86

Mr. Joe Porter
Environmental Engineer
Vertac Chemical Corporation
P.O. Box 2648
West Helena, AR 72390

Dear Mr. Porter:

I am in the process of finalizing the inspection report pursuant to the May 30, 1986 site visit to your facility. I will need a copy of the items listed below so that my report may be completed.

- (1) Log sheets for the Waste Water Treatment System's ^{Influent} Analytical Monitoring for 1984 and 1985.
- (2) A description of the steps taken to identify and correct the cause for low pH process water going into the wastewater treatment system.

Please submit the above requested information within ten (10) days of receipt of this letter.

If you have any questions, please do not hesitate to call.

Sincerely,

Karen Deere

Karen Deere
Hazardous Waste Inspector
Hazardous Waste Division

KD:jer

ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
LITTLE ROCK, ARKANSAS

COMPLAINT REPORT

COMPLAINT NUMBER HW-067

CSN NUMBER _____

DATE INFORMATION RECEIVED 5-20-86

COMPLAINANT NAME Kenneth Cartt PHONE 572-7948

ADDRESS Rt 1 Box 106 B CITY Helena COUNTY _____

NATURE OF COMPLAINT: ⁷²³⁴²
AIR _____ WATER _____ SOLID WASTE _____

MUNICIPAL _____ INDUSTRIAL X OTHER _____

DESCRIPTION IN DETAIL Noxious odors coming from Vertac,
very strong the night of 5-19-86. Mr Cartt has noticed the
odors along highway 242 but only during the past week have
the odors been detected at his home. He says they are almost
unbearable from late afternoon to about midnight. He talked
to Joe Porter who said the odors were coming from the
ponds. Mr. Cartt's wife became ill over them,

LOCATION IN DETAIL Vertac Chemical Corp off highway
242 West Helena.

HOW RECEIVED: PHONE X LETTER _____ VERBAL _____

PERSON RECEIVING REPORT M. Duffee

INSPECTOR SHOULD CONTACT Joe Porter Environmental Engineer

ADDRESS Highway 242 West Helena PHONE 572-3701

INSPECTOR REFERRED Deere DISTRICT _____

FOLLOW UP REPORT

COMPLAINT NUMBER _____

CSN NUMBER _____

INSPECTOR Karen Deere

DATE 2 June 86

ACTION TAKEN _____

Looked over ponds while conducting regular CME. Organisms in ponds had died, resulting in no biological treatment of sanitary and process wastewater. Ponds are in the process of being reseeded, which will eliminate the odors.

FURTHER ACTION TAKEN _____

INSPECTOR _____

DARI _____

RCRA INSPECTION

SITE IDENTIFICATION

E.P.A. ID #

Date

ARD990660649

30 May 86

Site Name

Street (or other identifier)

Vestac Chemical Corp.

Highway 242 South
P.O. Box 2648

City

State

Zip Code

County Name

West Helena

AR

72390

Phillips

Site Operator Information

Name

Telephone Number

501-572-3761

Street

City

State

Zip Code

Site Description

Custom Chemical Manufacturing, insecticide
Manufacturing

Type of Ownership

☐ Federal☐ State☐ County☐ Municipal☒ Private☒ Generator☐ Transporter☐ Treatment☒ Storage☒ Disposal☐ Non-generator☐ Small-generator☐ Exempted

INSPECTION INFORMATION

Principal Inspector Information

Name

Title

Karen Moore

Hazardous Waste Inspector

Organization

Telephone No. (area code & No.)

ADPC/E

(501) 562-7444

Inspection Participants

Joe Porter - Environmental Engineer - Vestac

David Morrow - ADPC/E

Blake Galloway - ADPC/E

Sammy Bates - ADPC/E

Vertac - W. Helena
ARD990660649

Generator's Checklist

Sec B.1. FO05 - Facility reported this material as D001 on Biennial Report. However, this waste contains more than 10% ^{toluene}. Facility generated 8957 tons ^{Permethrin} of waste in 1985 which was shipped to Chemical Resources in Tulsa, OK and Gibraltar Chemical Resources in Winona, TX for deep well injection.

2. D001 - Cypermethrin production waste; facility generated 4213 tons of this material in 1985; waste was shipped to Chemical Resources in Tulsa, OK and Gibraltar Chemical Resources in Winona, TX for deep well injection.

D001 - Xerosene based polymer waste; facility generated 12,240 pounds in 1985; waste was shipped to CECOS/BFI in Livingston, LA for landfilling.

3. Propanoic acid production waste is neutralized in process and discharged into wastewater treatment system. Facility generates approx 75,000 gals/yr.

Usoyox Production waste water is
~~RP. E-2-86~~
~~treated in process~~ and discharged
to the wastewater treatment system.
Approximately 700 gals of waste is
produced per product batch.

Vertac - W. Helena
ARD990660649

Surface Impoundments

The facility has a wastewater treatment system on-site which handles both process and sanitary wastes. There are three lagoons associated with this system.

Vertac had originally asked for interim status for these impoundments in case they would need this capability for their contract manufacturing business. On Nov 1, 1984, company officials stopped classifying the lagoons as hazardous because (1) they had ^{RD 4-2-84} not used the lagoons for hazardous waste only once (pH = 1.8 SU) and (2) maintaining the hazardous waste classification was not cost effective. In a letter dated November 16, 1984, Dick Quinn officially withdrew the lagoons from Vertac's Part A. There were no conditions to this change in classification.

Attached are 13 copies of laboratory log sheets for the wastewater treatment

system. The dates span Jan 3 to April 18, 1986 with each log showing an influent pH either less than 2.0 or greater than 12.5. For logs which show a pH range, this represents the minimum and maximum values taken that day. The pH of the influent on the day of the inspection was 7.53 SD.

There is a groundwater monitoring system in place around the unit. However, this system does not meet RCRA requirements.

Facility personnel stated that a thermocouple had gone out in the propionic acid process which caused the lack of acid removal from process water, resulting in a low pH. The problem was traced to the thermocouple in mid-April. The high pH values can be traced to two points (1) boiler blowdown which receives no treatment, and (2) the over treatment of propionic acid waste water which is not testing until it becomes the influent.

Log sheets are available for 1984-85
which show occasional high pH but
reportedly, no low pH.

RCRA COMPLIANCE INSPECTION REPORT
TSD FACILITIES CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? (265.11 - Identification Number) ☒ Yes ☐ No
- A. If yes, EPA I.D. No. ARD990660649
If no, explain _____
2. Has facility received hazardous waste from a foreign source? (265.12 - Required notices) ☐ Yes ☒ No
- A. If yes, has he filed a notice with the Reg. Admin. ☐ Yes ☒ No
3. Has the facility received waste from off-site for recycling, reuse or reclamation? ☐ Yes ☒ No
- If yes, describe waste type and amount and method to be used. _____

Waste Analysis

4. Has the owner/operator obtained detailed chemical and physical analyses of representative samples of all hazardous wastes prior to treating, storing or disposing of those wastes? ☒ Yes ☐ No
- If yes,
- a. Have the analyses been repeated as the processes or operations generating the wastes change? ☒ Yes ☐ No
- b. For off-site facilities are analyses repeated when the waste received does not match the waste identified on the accompanying manifest? ☐ Yes ☒ No N/A
5. For off-site facilities, is each shipment of hazardous waste received at the facility inspected and if necessary, analyzed to determine if it corresponds to the waste listed on the accompanying manifest? ☐ Yes ☒ No N/A
6. Does the facility have a written waste analysis plan? (265.13 - General Waste Analysis) ☒ Yes ☐ No
- a. If yes, is a copy maintained at the facility? ☒ Yes ☐ No
7. Does the waste analysis plan include the following:
- a. Parameters for which each waste will be analyzed and the rationale for selection of these parameters? ☒ Yes ☐ No
- b. Test methods used to test for these parameters? ☒ Yes ☐ No

Site Name: Weston
 I.D. Number: W. H. H. H.
ARD990660649

- c. Sampling method used to obtain a representative sample? ☒ Yes ☐ No
- d. Frequency with which the initial analysis will be reviewed or repeated? ☒ Yes ☐ No
1. If yes, does it include requirements to re-test when the process or operation generating the waste has changed? once / year or more frequent if process changes ☒ Yes ☐ No
- e. (For off-site facilities) Waste analyses that generators have agreed to supply? ☐ Yes ☐ No h/A
- f. (For off-site facilities) Procedures which are used to inspect and analyze each shipment of hazardous waste received at the facility, including:
1. Procedures to be used to determine the identity of each movement of waste? ☐ Yes ☐ No h/A
2. Sampling method to be used to obtain representative sample of the waste to be identified? ☐ Yes ☐ No h/A
8. Does the facility provide adequate security to minimize the possibility for the unauthorized entry of persons or livestock onto the active portions of the facility? (265.14 - Security) ☒ Yes ☐ No

If no, describe the situation at the facility, document the facility's exemption under 265.14 a. (1) and (2).

If not exempt, is security provided through:

- a. 24-hour surveillance system which continuously monitors and controls entry onto the active portion? (e.g. television monitoring or guards). ☒ Yes ☐ No

OR

- b. 1. Artificial or natural barrier completely surrounding the active portion? (e.g. fence or fence and cliff)? ☒ Yes ☐ No

Describe type of security

7' chain link fence

AND

2. Means to control entry at all times, through the gates or other entrances to the active portion (attendant, television monitors, locked entrance, controlled roadway access)? ☒ Yes ☐ No

Describe type of security.

guard

Include a drawing indicating any inadequacies in the facility's security system.

- c. Is a sign with the legend, "Danger-Unauthorized Personnel Keep Out," posted at the entrance and at other locations in sufficient numbers to be seen from any approach to the active portion? (265.14 - Security) ☒ Yes ☐ No

Is it written in English and legible from at least 25 feet? ☒ Yes ☐ No

NOTE: The sign must be written in any other language predominant in the area surrounding the facility (e.g. In New Mexico and Texas areas bordering Mexico, the sign must be in Spanish).

If an existing sign with a legend other than "Danger-Unauthorized Personnel Keep Out," what does that legend say?

General Inspection Requirements

9. a. Does the owner/operator maintain a written inspection schedule? (265.15 - General Inspection Requirements) ☒ Yes ☐ No

If yes, does it contain at least schedules for inspecting the following:

1. Monitoring equipment? (If applicable) ☐ Yes ☒ No *N/A*
2. Safety and emergency equipment? ☒ Yes ☐ No
3. Security devices? ☒ Yes ☐ No
4. Operating and structural equipment (if applicable) ☒ Yes ☐ No

- b. Does the schedule or plan identify the types of problems to be looked for during inspection? ☒ Yes ☐ No

1. Malfunction or deterioration (e.g. inoperative sump pump, leaking fitting, eroding dike, corroded pipes or tanks, etc.) ☒ Yes ☐ No
2. Operator error ☒ Yes ☐ No
3. Discharges (e.g. leaks from valves or pipes joint breaks, etc.) ☒ Yes ☐ No

- c. Is the schedule maintained at the facility? ☒ Yes ☐ No

- d. Are these inspections conducted? ☒ Yes ☐ No

10. Does the owner/operator have an inspection log?

See attachment
(265.15 - General Inspection Requirements)

☒ Yes ☐ No

- a. If yes, does it include:

1. Date and time of inspection? ☒ Yes ☐ No
2. Name of inspector? ☒ Yes ☐ No
3. Notation of observations? ☒ Yes ☐ No
4. Date and nature of repairs or remedial action? ☒ Yes ☐ No

Site Name: Intec
 I.D. Number: W. K. Helena
ARD990660649

- b. Are there any malfunctions or other deficiencies noted in the inspection log that remain uncorrected?
 (Use narrative explanation sheet). Yes ✓ No
- c. Are records of the inspection log maintained at the facility for three (3) years? ✓ Yes No

Personnel Training

11. Have facility personnel successfully completed a program of classroom or on-the-job training? ✓ Yes No

- a. Does the training program include instructions in the following:

(1) procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment ✓ Yes No

(2) key parameters for automatic waste feed cut-off systems Yes No h-1A

(3) operation of communication or alarm systems ✓ Yes No

(4) response to fires, explosions and groundwater contamination incidents ✓ Yes No

(5) shutdown of operations ✓ Yes No

(6) general hazardous waste management procedures ✓ Yes No

b. Is the program directed by a person trained in hazardous waste management procedures? ✓ Yes No

c. Have personnel completed annual training reviews? ✓ Yes No

- d. Does the owner/operator maintain the following documents:

(1) job title, job description and name of employee for each position at the facility related to hazardous waste management ✓ Yes No

(2) written description of the type and amount of both introductory and continuing training ✓ Yes No

(3) written documentation that the training has been completed by facility personnel ✓ Yes No

Requirements for Ignitable, Reactive or Incompatible Waste

12. Does facility handle ignitable or reactive wastes?
 (265.17 - Ignitable, Reactive, Incompatible Wastes)
 (Circle appropriate type(s) of waste(s). ✓ Yes No

- a. If yes, is waste separated and confined from sources of ignition or reaction, (open flames, smoking, cutting and welding, hot surfaces, frictional heat) sparks (static, electrical or mechanical), spontaneous ignition (e.g. from heat producing chemical reactions) and radiant heat?

✓ Yes No

b. Are smoking and open flame confined to specifically designated locations?

☒ Yes ☐ No

c. Are "No Smoking" signs posted in hazardous areas where ignitable or reactive wastes are handled?

☒ Yes ☐ No

d. Is waste handled in a manner which generates extreme heat, pressure, violent reaction, toxic fumes or other dangers to human health or the environment?

☐ Yes ☒ No

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and operation of facility)

☒ Yes ☐ No

If yes, use narrative explanations sheet to explain.

2. Is the facility equipped with (265.32 - Required equipment)

a. Internal communications or alarm system

☒ Yes ☐ No

1. Is it easily accessible in case of emergency?

☒ Yes ☐ No

b. Telephone or two-way radio to call emergency response personnel

☒ Yes ☐ No

c. Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment?

☒ Yes ☐ No

1. Is this equipment tested to assure its proper operation?

☒ Yes ☐ No

d. Water of adequate volume for hoses, sprinklers or water spray system

1. Describe source of water

☒ Yes ☐ No
City of W. Helena - front of plant
City of Helena - back of plant

2. Indicate flow rate and/or pressure and storage capacity, if available.

Storage - 500,000 gallons
in industrial park,

3. Is there sufficient aisle space to allow unobstructed movement of personnel and emergency equipment? (265.35 - Required Aisle Space)

☒ Yes ☐ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with local authorities)

☒ Yes ☐ No

If no, has the owner/operator attempted to make such arrangements?

☐ Yes ☐ No h/A

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with local authorities)

☒ Yes ☐ No

If yes, indicate primary authority West Helena

- a. Is the fire department a city or volunteer fire department? City

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers?

☒ Yes ☐ No

Are they readily available to the emergency coordinator? (265.37 - Arrangements with local authorities)

☒ Yes ☐ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? If no, has the owner/operator attempted to do this? (265.37 - Arrangements with local authorities)

☒ Yes ☐ No
☒ Yes ☐ No W/A

8. If the State, or local authorities decline to enter into the above referenced agreements, has this situation been entered in the operating record? (265.37 - Arrangements with local authorities)

W-2-86
☒ Yes ☐ No W/A

Section C - Contingency Plan and Emergency Procedures

1. Does the facility have a contingency plan? (265.52 Content of Contingency Plan)

☒ Yes ☐ No

- a. If yes, does it contain:

1. actions to be taken in response to emergencies? ☒ Yes ☐ No
2. description of arrangements with police, fire and hospital officials? ☒ Yes ☐ No
3. list of names, addresses, phone numbers of persons qualified to act as emergency coordinator? ☒ Yes ☐ No
4. list, including the location and physical description of all emergency equipment ☒ Yes ☐ No
5. evacuation plan for facility personnel including signals, primary and alternate routes? ☒ Yes ☐ No

2. Is a copy of the contingency plan maintained at the facility? (265.53 - copies of contingency plan)

☒ Yes ☐ No

3. Has a copy been supplied local police, fire depts., and hospitals? (265.53 - Copies of contingency plan)

☒ Yes ☐ No

4. Has the contingency plan been updated and amended as necessary?

☒ Yes ☐ No

Site Name: Westac
I.D. Number: W.H. Aleno
ARD990660649

5. Is the plan a revised SPCC Plan? (265.52 - content of contingency plan)

☒ Yes ☐ No

6. Is there an emergency coordinator on-site or within short driving distance of the plant at all times

☒ Yes ☐ No

If yes, list primary emergency coordinator:

Joe Porter

Section D - Manifest System

1. Has facility received hazardous waste from off-site since November 19, 1980? (265.71 - Use of manifest system)

☐ Yes ☒ No 5-2-86

a. If no, questions 1, 2, 3 and 4 are not applicable.

b. If yes, does the facility retain copies of all manifests for at least three (3) years?

☐ Yes ☐ No N/A

1. Are the manifests signed and dated and returned to the generator?

☐ Yes ☐ No N/A

2. Is a signed copy given to the transporter?

☐ Yes ☐ No N/A

2. Has the facility received any hazardous waste from a rail or water (bulk shipment) transporter since Nov. 19, 1980? (265.71 - Use of manifest system)

☐ Yes ☐ No N/A

a. If yes, is it accompanied by a shipping paper

☐ Yes ☐ No N/A

1. Does the owner/operator sign and date the shipping paper and return a copy to the generator?

☐ Yes ☐ No N/A

2. Is a signed copy given to the transporter?

☐ Yes ☐ No N/A

3. Has the facility received any shipments of hazardous waste since November 19, 1980, which were inconsistent with the manifest? (265.72 - Manifest discrepancies)

☐ Yes ☐ No N/A

a. If yes, has he resolved the discrepancy with the generator and transporter within 15 days?

☐ Yes ☐ No N/A

1. If no, has Regional Administrator been notified in writing?

☐ Yes ☐ No N/A

4. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (265.76 - Unmanifested waste report)

☐ Yes ☐ No N/A

a. If yes, has he submitted an unmanifested waste report to the Regional Administrator within 15 days?

☐ Yes ☐ No N/A

Section E - Record Keeping and Reporting

1. Does the facility have a written operating record? (265.73 - Operating record)

☒ Yes ☐ No

a. Is a copy maintained at the facility?

☒ Yes ☐ No

1. b. Does the record include

1. Description and quantity of each hazardous waste and the methods and dates of its treatment, storage or disposal at the facility
2. Location and quantity of each hazardous waste at each location
 - a. Is this information cross-referenced with specific manifest document numbers, if applicable?
3. (for disposal facilities only) Location and quantity of each hazardous waste recorded on a map or diagram of each cell or disposal area?
4. Record and results of waste analyses
5. Reports of incidents involving implementation of the contingency plan (If applicable)
6. Records and results of required inspections
7. Monitoring, testing or analytical data where required
8. Closure cost estimates and for disposal facilities, post-closure cost estimates

☒ Yes ☐ No☒ Yes ☐ Non/a ☐ Yes ☐ No☐ Yes ☒ No n/a☒ Yes ☐ No☐ Yes ☒ No n/a☒ Yes ☐ No☒ Yes ☐ No☒ Yes ☐ No

2. Has the owner/operator submitted biennial reports as required?

☒ Yes ☐ NoSection F - Plans and Reports

1. Have all plans and reports been visually inspected and/or been made available for inspection? (265.74 - Availability, retention and disposition of records)

☒ Yes ☐ No

List plans and/or reports not made available for inspection. If reports are accessible and not made available for inspection, explain.

n/a

2. Did operator provide inspector with a drawing of the facility?

☒ Yes ☐ No

- a. If yes, please indicate which are hazardous waste facilities on the drawing.

excluded in Part B

3. Indicate Types of hazardous waste facilities.

- ☒ Containers
- ☒ Tanks
- ☒ Surface Impoundments
- ☐ Waste Piles
- ☐ Land Treatment
- ☐ Landfill
- ☐ Incinerator
- ☐ Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment
- ☐ Groundwater Monitoring Program

Vertac - W. Helena
ARD 9906660649

Sec A.10. Facility inspection log covers drum storage area. However, there is no mention of the pump at this area. The pump pump is not operational and has not been for an undetermined amount of time. The pump was full of water which had overflowed into the drainage area serviced by the wastewater treatment system. No mention ~~of this~~ ^{KB-85} was made of this situation on the inspection logs.

Sec B.1. The ground between the ^{hazardous waste} drum storage area and product storage area is discolored by di nitro-butyl phenol, a yellow solid which was manufactured by the previous owner (Anesuly) of the facility. Mr Porter stated the previous owners had buried the material on site. Three drums were dug up during construction activity.

1-52

Date _____

UTILITY OPERATOR INSPECTION LOGSHEET

Time _____

Operator _____

LOCATION	Checkpoint	Remarks	Time
Lab Sump	% full		
	Pump OK?		
Permethrin/ Propanil Sump	% full		
	Pump OK?		
BSC Sump	% full		
	Pump OK?		
Lannate Sump	% full		
	Pump OK?		
DRA Sump	% full		
Tank Dikes	Cells full?		
	Leaks/spills?		
Railcars	Leaks/spills?		
Process Areas Warehouses	Leaks?		
	Spills?		
Drum storage	leaks/spills?		
Stormwater ditches	% full		
Stormwater outfall	discharge valve open?		
	time opened		
	meter readings		
	time closed		
	meter readings		
Treatment Ponds	Equalization pond level		
	Bio pond level		
	Polish pond level		
	Aerators on and OK?		
	Odors?		
API Separator	Leaks?		
	Meter readings		
	pH		
Pump House	Leaks/spills?		
	FE-106 - % flow		
	FE-107 - % flow		
	FE-108 - % flow		
	Blower oil level		
North clarifier	On and OK?		
South clarifier	On and OK?		
River Pumps	On and OK?		
	% flow		
	Meter readings		
Pipelines	Leaks?		
T-008	level - gallons		

NOTES:

Denton West Helen
AR 0990660649

CONTAINERS STORAGE CHECKLIST
(Subpart I - Use and Management of Containers 265.170)

1. Does the facility store hazardous waste in containers?

☒ Yes ☐ No

If no, do not complete this form.

2. Are the containers in good condition?
(check for leaks, corrosion, bulges, etc.)

☒ Yes ☐ No

If no, explain in narrative and document with photograph.

3. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?

☒ Yes ☐ No

4. Is the waste compatible with the containers and/or its liner?

☒ Yes ☐ No

If no, explain in narrative.

5. Are the stored containers closed?

☒ Yes ☐ No

If no, explain in narrative.

6. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak?

AR 0990660649
☒ Yes ☒ No

If yes, explain in narrative.

7. Are each of the containers inspected at least weekly?

☒ Yes ☐ No

If no, explain in the narrative the frequency of inspection.

8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line?

☒ Yes ☐ No

If no, explain in narrative and document with photograph.

9. Are incompatible wastes stored in the same containers?

☐ Yes ☒ No

If yes, explain in narrative.

10. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?

☒ Yes ☐ No

If no, explain in narrative.

Vertac - W. Helena

ARD990660649

Container Storage

Container storage area held four drums of D001 hazardous waste at the time of inspection. All four drums were labelled and in good condition.

There were also approximately 130 drums of various waste being stored in this area until analyzed. Two of these drums contained an oily liquid which was standing on top of the drums and had overflowed onto the ground. The containment for this area is a sump whose area limits the maximum storage capacity to 96 drums.

As previously mentioned the pump which drains this sump has been inoperable for an undetermined amount of time. Water has overflowed into a drainage ditch.

Normal operating procedures require only a visual inspection of sump

water before discharging into the
wastewater treatment system. The
Container Section of the Part B
says that ~~the~~^{KP-2-86} compatible water
will be discharged and non-compatible
water will be dewatered as hazardous
waste. However, the facility does not
explain how compatibility will be
determined.

~~Yes~~ No 1/A

Site Name: Wentao
 I.D. Number: W. H. H. H.
 ARD990600249

Waste Analysis and Trial Tests

6. a. Has the tank been used to treat or store a hazardous waste substantially different from the waste previously treated or stored in the tank?

OR

See Attachment

Yes ✓ No

- b. Has a chemical treatment process been used in the tank which was substantially different than any previously used in the tank?

Yes ✓ No

a. or b. is yes,

1. Were waste analyses and trial treatment or storage tests conducted prior to the change?

OR

Yes ✓ No

2. Was written, documented information obtained on similar storage or treatment of similar wastes under similar conditions?

Yes ✓ No

Inspections

7. Does the owner/operator inspect the following at least daily, where present?

✓ Yes No

(Indicate which items are present in 7 and 8.)

- a. Discharge control equipment (e.g. waste feed cut-off, by pass and/or drainage systems)?

✓ Yes No

- b. Monitoring equipment (e.g. pressure and temperature gages)?

✓ Yes No

- c. Level of waste in each uncovered tank?

✓ Yes No

8. Does the owner/operator inspect the following at least weekly?

✓ Yes No

- a. Construction materials of tanks for corrosion or leaks?

✓ Yes No

- b. Construction materials of and area surrounding discharge confinement structures for erosion or signs of leakage?

✓ Yes No

9. What is the procedure for assessing the condition of the tank?

Explain in narrative. (e.g. How does the procedure allow for detection of cracks, leaks or corrosion or procedures for emptying the tank to allow entrance, etc.)

Visual Analysis daily
ultrasound testing annual

Site Name: Weston
 I.D. Number: W. Helen
 ARD990660649
☒ Yes ☐ No

11. Are ignitable or reactive wastes placed in tanks?

- a. If yes, are they treated, rendered or mixed before or immediately after placement in the tank so it no longer meets the definition of ignitable or reactive?

☐ Yes ☒ No

OR

- b. Is the waste protected from sources of ignition or reaction?

☒ Yes ☐ No

1. If yes, use narrative explanations sheet to describe separation and confinement procedures. *nitrocellulose on one tank (T002)*

2. If no, use narrative explanations sheet to describe sources of ignition or reaction. *1 tank is TPE-209*

OR

- c. Is the tank used solely for emergencies?

☐ Yes ☒ No

12. Has the facility ever placed incompatible wastes in the tank?

- a. If yes, what were the results. (Use narrative explanations sheet). (Look for signs of mixing of incompatible wastes, e.g. fire, toxic mist, heat generation, bulging containers, etc.)

☐ Yes ☒ No

13. If a waste is to be placed in a tank that previously held an incompatible waste, was that tank washed?

☐ Yes ☒ No *1/A*

- a. If yes, describe washing procedures (Use narrative explanation sheet.)

Describe how it is possible for incompatible wastes to be placed in the same tank. (Use narrative explanations sheet.)

Ventac - W. Helena
ARD 990660649

Tanks Checklist

There are four tanks used for storage of hazardous waste:

TB-112 - a 20,000 gal carbon steel tank with manual feed and discharge controls. The last hazardous waste held was D003. The tank has since been rinsed, with no sampling or analysis of rinseate, and is now used to store ^{one of the} non-hazardous waste ^{KP 6-3-86} which feed into the waste-water treatment system.

TPE209 a 12,000 gal glass-lined stainless steel tank with manual feed and discharge controls. This tank holds permethrin/cypermethrin waste. This tank is vented to a scrubber.

T002 a 17,000 gal stainless steel tank with manual feed and discharge controls. This tank is operated ^{with a flame arrestor} under a nitrogen blanket. There were signs of an overflow from this tank,

facility personnel did not know the date of this occurrence ^{KD-82} This tank also holds Permethrin / Cypermethrin waste.

T-L105 - a 17,000 stainless steel tank which was not in use during the inspection. The last volume of waste held was D004 classified.

All tanks have approximately three foot high concrete containment walls surrounding each tank. The tanks sit on a concrete pad which is drained by a sump and manually operated pump. Only a visual inspection is performed on water / liquids within the containment area before being discharged to the wastewater treatment system.

Site name: Worton
I.D. Number: W. Hebe
ARD990660649

SURFACE IMPOUNDMENTS CHECKLIST
Subpart K - Surface Impoundments 265.220

NOTE: Check all surface impoundments. Fill out one checklist for any impoundment in violation. Fill out one checklist for all other impoundments in compliance. Indicate number of surface impoundments at the facility.

1. Are there any surface impoundments which are not being used which the facility does not plan to use in the future? ☐ Yes ☒ No
a. If yes, has all hazardous waste and hazardous waste residue been removed from the impoundment? ☐ Yes ☐ No h/A
2. Are impoundments presently used to treat or store waste? ☒ Yes ☐ No
3. Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard? ☒ Yes ☐ No
a. If no, what was the freeboard? h/A
4. Is there evidence of overtopping of the dike? ☒ Yes ☒ No
If yes, please describe. h/A RD
6-2-86
5. Do earthen dikes have a protective cover to minimize wind and water erosion? ☒ Yes ☐ No
Provide description of containment. grass
6. What wastes are treated or stored in the impoundment? (Use narrative explanations sheet). DOO2, process wastewater with pH < 2 or > 12.5 SD. See attachments
7. Are hazardous wastes chemically treated in the impoundment which are substantially different from wastes previously treated or using different treatment methods than previously used? ☐ Yes ☒ No
a. If yes, are
1. Waste analyses and trial tests conducted on these wastes? ☐ Yes ☐ No h/A
OR
2. Does the owner/operator have written documented information on similar treatment of similar wastes under similar operating conditions? ☐ Yes ☐ No h/A
b. Is this information retained in the operating record? ☐ Yes ☐ No h/A

3. Is the impoundment completed with two or more liners and a leachate collection system between such liners? Yes No h/A
4. Does the impoundment have a groundwater monitoring system in place? Yes No h/A

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 1-3-86

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D N/A	D 65700	D 86200	D 25960	D N/A	R 50140	R
PH	D 12.7	D 8.5	D 7.3	D 7.1		D 7.1	A
DO		D 12.2	D 11.8	D 11.2		D 4.7	A
FOU			W			W	A
COD	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T. SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
OIL & GREASE							A
PHENOL(S) ug/L		M	M			W	A
TOTAL PEST	M	M		M		W	A
PERMETHRIN-PPB	M	M	M			W	A
O2 UPTAKE			W				
CHLOR							
SF. COND							

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 2-20-86

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D <i>NA</i>	D 26800	D 77700	D 30850	D <i>NA</i>	R 33672	R
PH	D 1.7-6.9	D 6.4	D 7.7	D 7.6		D 7.4	A
DO		D 10.0	D 0.8	D 0.1		D 0.2	A
BOD			W			W	A
COD	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T. SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
OIL & GREASE							A
FECAL (S) <i>ug/L</i>		M	M			W	A
TOTAL PEST <i>PPB</i>	M 12810.12	M		M		W 135.19	A
PERMETHRIN-PPB	M 218.44	M	M			W 128.39	A
O2 UPTAKE			W				
CHLOR							
SF. COND							

Pesticides From 2-19-86 samples

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 2-29-85

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D <i>ML</i>	D 420000	D 76900	D 30850	D <i>ML</i>	R 16544	R
PH	D 11.3-12.6	D 4.8	D 7.3	D 7.2		D 7.5	A
DO		D 10.4	D 3.9	D 0.3		D 5.9	A
BOD			W			W	A
COD	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T. SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
L&GREASE							A
PHENOL (S) <i>UG/L</i>		M	M			W	A
TOTAL PEST-PPB	M 5391.91	M		M		W	A
PERMETHRIN-PPB	M 268.77	M	M			W	A
O2 UPTAKE			W				
DHEP							
SF. COND							

Per Tischer from 2-26-86 sample

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 3-3-86

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
LOW	D <i>Ma</i>	D 42467	D 74200	D 30850	D <i>Ma</i>	R 31736	R
H	D 0.9-6.4	D 5.0	D 7.7	D 7.6		D 7.8	A
D		D 10.2	D 1.7	D 0.2		D 6.6	A
DD			W 600.0			W 237.5	A
DD	W	W	W	W		W	A
HLORIDE	W	W	W	W		W	A
.SOLIDS						M	A
US SOLIDS		W	W	W	W	W	A
ETT SOLIDS			W				
OL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
MMONIA-N		W	W			W	
ITRATE-N		W	W			W	
ULFATE		W	W			W	A
HOSPHATE-PO4	M	W	W				
IL&GREASE							A
ENDOL (S) <i>ug/L</i>		M	M			W	A
TOTAL PEST-PPB	M	M		M		W	A
ERMETHRIN-PPB	M	M	M			W	A
2 UPTAKE			W				
NEP							
P.COND							

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 3-6-86

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D <i>ma</i>	D 43900	D 69000	D 30850	D <i>NA</i>	R 23244	R
PH	D 1.1-3.4	D 4.6	D 7.6	D 7.5		D 7.7	A
DO		D 11.2	D 3.6	D 0.2		D 7.5	A
BOD			W			W	A
COD	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T. SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
U-REASE							A
PHENOL (S) ug/L		M	M			W	A
TOTAL PEST-PPB	M 7684.72	M 768.73		M 482.10		W 85.63	A
PERMETHRIN-PPB	M 19632	M 63.94	M	473.54		W 79.78	A
O2 UPTAKE			W				
DNEP							
SP. COND							

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 3-10-86

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D <i>ML</i>	D 42930	D 74800	D 30850	D <i>N/A</i>	R 56220	R
PH	D 1.3-7.4	D 4.7	D 7.7	D 7.6		D 8.0	A
DO		D 10.1	D 3.8	D 0.1		D 6.8	A
BOD			W 300.0			W 185.0	A
ED	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T. SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
OIL & GREASE							A
PHENOL (S) <i>ug/L</i>		M	M			W	A
TOTAL PEST-PPB	M	M		M		W	A
PERMETHRIN-PPB	M	M	M			W	A
O2 UPTAKE			W				
DHEP							
SP. COND							

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 3-11-86

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D <i>ma</i>	D 30300	D 75100	D 30850	D <i>ma</i>	R 42900	R
PH	D 1.5	D 4.7	D 8.0	D 7.7		D 8.1	A
DO		D 10.4	D 6.9	D 0.1		D 6.5	A
BOD			W			W	A
	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T. SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
Oil & GREASE							A
PHENOL (S) <i>ug/L</i>		M	M			W	A
TOTAL PEST-PPB	M	M		M		W	A
PERMETHRIN-PPB	M	M	M			W	A
O2 UPTAKE			W				
DNEP							
SP. COND							

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D <i>mu</i>	D 54050	D 62350	D 30850	D <i>N/A</i>	R 32154	R
PH	D 1.4-7.5	D 4.4	D 7.7	D 7.6		D 8.2	A
DO		D 10.6	D 1.4	D 0.2		D 9.1	A
BOD			W 433.3			W 281.3	A
COD	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T.SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
LLGREASE							A
PHENOL (S) ug/L		M	M			W	A
TOTAL PEST-PPB	M	M		M		W	A
PERMETHRIN-PPB	M	M	M			W	A
O2 UPTAKE			W				
DNEP							
SP. COND							

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 4-2-85

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D N/A	D 123700	D 219600	D 0	D 0	R 0	R
PH	D 0.9	D 4.5	D 7.7	D 7.7		D 8.5	A
DO		D 5.4	D 0.8	D 0.2		D 7.8	A
BOD			W			W	A
COD	W 18225.8	W 5161.3	W 1322.4	W 1080.6		W 665.4	A
CHLORIDE	W 482.8	W 1622.6	W 1610.4	W 1604.3		W 1573.7	A
T. SOLIDS						M 5400.0	A
SUS SOLIDS		W 78.6	W 620.0	W 343.3	W 425.0	W 252.3	A
SETT SOLIDS			W 3.5				
VOL SOLIDS		37.0	W 470.0	283.3	W 295.0	202.2	
ALKALINITY	W 0	W 0	W 822.5	W 822.5		W 844.9	A
AMMONIA-N		W 20.0	W 1.03			W 0.65	
NITRATE-N		W 1.9	W 2.1			W 2.15	
SULFATE		W 1040.0	W 1060.0			W 994.0	A
PHOSPHATE-PO4	M 6.3	W 2.5	W 0.73				
GREASE		"				"	A
PHENOL (S) ug/L		M 173.5	M 55.1			W 310	A
TOTAL PEST-PPB	M	M		M		W	A
PERMETHRIN-PPB	M	M	M			W	A
O2 UPTAKE			W 410.0				
DHEP							
SF. COND		6600	7000			6900	

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 4-7-86

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D 12A	D 126533	D 193867	D 30850	D NA	R 0	R
PH	D 7.5-12.6	D 4.8	D 7.7	D 7.7		D 8.2	A
DO		D 5.4	D 0.2	D 0.2		D 3.1	A
BOD			W 426.7			W 352.5	A
COD	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T. SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
GREASE							A
PHENOL (S) ug/L		M	M			W	A
TOTAL PEST-PPB	M	M		M		W	A
PERMETHRIN-PPB	M	M	M			W	A
O2 UPTAKE			W				
DNEP							
SP. COND							

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 4-8-86

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D <i>na</i>	D 4300	D 7700	D 0	D 0	R 0	R
PH	D 1.3-4.8	D 4.8	D 7.9	D —		D 8.0	A
DO		D 0.5	D 0.2	D —		D 3.4	A
BOD			W			W	A
D	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T. SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
OIL & GREASE							A
PHENOL (S) <i>ug/L</i>		M	M			W	A
TOTAL PEST-PPB	M	M		M		W	A
PERMETHRIN-PPB	M	M	M			W	A
O2 UPTAKE			W				
DNEP							
SP. COND							

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 4-14-86

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D <i>mu</i>	D 98667	D 281466	D 0	D <i>mu</i>	R 0	R
PH	D 4.6-13.7	D 5.1	D 7.9	D 7.9		D 8.9	A
DO		D 0.1	D 0.1	D 0.1		D 8.8	A
BOD			W 781.7			W 405.6	A
	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T. SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
Oil & GREASE							A
PHENOL (S) <i>ug/L</i>		M	M			W	A
TOTAL PEST-PPB	M	M		M		W	A
PERMETHRIN-PPB	M	M	M			W	A
O2 UPTAKE			W				
DHEP							
SP. COND							

ENVIRONMENTAL REPORT (ALL RECORDS)

DATE 4-18-85

PARAMETER	INFLUENT	EQUALIZATION	AERATION	CLARIFIER	SLUDGE RETURN	OUTFALL 002	OUTFALL 001
FLOW	D NA	D 0	D 0	D 0	D 0	R 0	R
PH	D 12.8-13.2	D 5.3	D 8.1	D NO		D 9.0	A
DO		D 0.5	D 8.5	D Sample		D 9.1	A
BOD			W			W	A
OD	W	W	W	W		W	A
CHLORIDE	W	W	W	W		W	A
T. SOLIDS						M	A
SUS SOLIDS		W	W	W	W	W	A
SETT SOLIDS			W				
VOL SOLIDS			W		W		
ALKALINITY	W	W	W	W		W	A
AMMONIA-N		W	W			W	
NITRATE-N		W	W			W	
SULFATE		W	W			W	A
PHOSPHATE-PO4	M	W	W				
OIL & GREASE							A
PHENOL (S) ug/L		M	M			W	A
TOTAL PEST-PPB	M	M		M		W	A
PERMETHRIN-PPB	M	M	M			W	A
O2 UPTAKE			W				
DHEP							
SP. COND							

Site name: Vertac
I.D. no.: W. Avelar
ARD990620649

Closure

A. Does the facility have a closure plan?

☒ Yes ☐ No

1. Does the plan include:

a. A description of how and when the facility will be partially, then finally closed?

☒ Yes ☐ No

b. An up-to-date estimate of the maximum inventory of wastes in storage and treatment at any time during the life of the facility?

☒ Yes ☐ No

c. A description of decontamination procedures for facility equipment?

☒ Yes ☐ No

d. An estimate of expected year of closure?

☒ Yes ☐ No

2. Does the plan include a schedule for final closure? If yes, does it include:

☒ Yes ☐ No

a. Time estimates for each phase of closure for each area?

☒ Yes ☐ No

b. Total time estimate for closure?

☒ Yes ☐ No

3. Using narrative explanations sheet, give a brief summary of how the facility plans to close each area of hazardous waste management; or attach a copy of the closure plan.

4. Does the plan address all areas of hazardous waste management?

☒ Yes ☐ No

5. Has the plan been amended as necessary to reflect changes in facility operations or design?

☐ Yes ☒ No

6. Are cost estimates available and modified as necessary? If yes, give latest cost estimate and date of adjustments.

☒ Yes ☐ No

B. Have closure activities begun at the facility?

☐ Yes ☒ No

1. If yes,

a. Was the closure plan submitted to the Regional Administrator at least 180 days prior to beginning these activities?

☐ Yes ☐ No h/A

b. Were all wastes treated or disposed of within 90 days of the final receipt of wastes?

☐ Yes ☐ No h/A

Site Name: Wester
I.D. no.: W.D. 11111
ARD990660649

If no, give explanation including waivers or extensions granted by Regional Administrator.

 Yes No h/A

- c. Do the actual closure activities correspond to those written in the closure plan?

 Yes No h/A

If no, include narrative explanation.

2. Was closure completed within 180 days of receipt of final volume of wastes?

 Yes No h/A

If no, give explanation, including waivers or extensions granted by the Regional Administrator.

 Yes No h/A

3. At completion, did the facility submit a certification of closure to the Regional Administrator?

 Yes No h/A

If yes, was it signed by both the owner/operator and an independent registered professional engineer?

 Yes No h/A



5-21-86

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

May 21, 1986

Jay A. Pruett
Manager of Environmental Affairs
Southwestern Electric Power Company
Post Office Box 21106
Shreveport, Louisiana 71156

Dear Mr. Pruett:

Re: Quarterly Groundwater Analyses
Ash Pond Metals Analyses
Flint Creek Power Plant
Permit # 1714-WR-2 (May 13, 1986)

In reviewing the referenced report, it was discovered that the nitrate concentrations are unusually high, i.e. 13.9 mg/l at the Fred Harger location and 34.8 at the Andy Foreman location. I need an explanation for these values and I would like to know what actions, if any, are being taken to correct this problem.

I looked through our files for a copy of your groundwater monitoring plan and was unable to locate one. Please provide this Department with a current copy of your groundwater monitoring plan.

Thank you for your cooperation in this matter. If I may be of assistance, please contact me.

Sincerely,

Joseph D. Williford

Joseph D. Williford
Acting Supervisor
Enforcement Section, NPDES Branch

JDW/jw

cc: Jamie Huens, District Field Inspector ✓



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

March 10, 1986

Mr. J. Williams
Vertac Chemical Corporation
P. O. Box 2749
Highway 242 South
West Helena, AR 72390

Dear Mr. Williams:

This Department has received the following Texas hazardous waste manifests which are missing the date of acceptance by the transporter:

223567, dated 1-26-86	223570, dated 1-25-86
223571, dated 1-25-86	223575, dated 1-29-86
223576, dated 1-29-86	223616, dated 1-28-86
223617, dated 1-28-86	223618, dated 1-27-86

Please provide corrected copies of these manifests showing the date of acceptance by the transporter to this Department within five (5) working days of receipt of this letter.

You should also be aware of Section 16 (c)(1)(B) of the Arkansas Hazardous Waste Management Code which states that both the Arkansas Transportation Commission transportation permit number and the Pollution Control transportation permit number must appear in Block C of the manifest. If there is not enough room for all required permit numbers, place the Pollution Control and ATC permit numbers in Block 15 as additional information.

If you have any questions, please let me know.

Sincerely,

Vicky Prewett
Vicky Prewett
Manifest Coordinator
Hazardous Waste Division

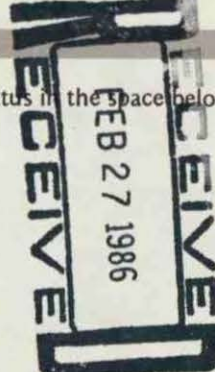
cc: David Walker, Vertac
Mike Bates, Chief, Enforcement Branch
Service Line, Inc.

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1985

This report is for the calendar year ending December 31, 1985
Read All Instructions Carefully Before Making Any Entries on Form

54-0068



I. NON-REGULATED STATUS

Explain your non-regulated status in the space below.

See instructions before completing this section.

This facility did not treat, store, or dispose of
regulated quantities of hazardous waste at any
time during 1985. ☐

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

This Facility's Non-Regulated Status is Expected to Apply:

☐ For 1985 Only ☐ Permanently

☐ Other _____
C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

V e r t a c C h e m i c a l C o r p - W e s t H e l e n a P l a n t
30 69

IV. FACILITY MAILING ADDRESS

3 P O B o x 2 7 4 9 - H w y 2 4 2 S o u t h
15 16 45

Street or P.O. Box

4 W e s t H e l e n a A R 7 2 3 9 0
15 16 41 42 47 51

City or Town

State Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

5
15 16 45

Street or Route number

6
15 16 41 42 47 51

City or Town

State Zip Code

VI. FACILITY CONTACT

2 J o e E P o r t e r
15 16 45

Name (last and first)

VII. COST ESTIMATES FOR FACILITIES

5 0 1 - 5 7 2 - 3 7 0 1
46 55

Phone No. (area code & no.)

\$ 1 6 1 0 0 0 \$
16 19 22 25 28 31

A. Cost Estimate for Facility Closure

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. W. Shackelford, Plant Manager

Print/Type Name

Title

Signature of Authorized Representative

Date Signed

2-25-86

Facility Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

T/A C

F A R D 9 9 0 6 6 0 6 4 9 1
1 2 13 14 15

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☒

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

G A R D 9 9 0 6 6 0 6 4 9
16 28

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1985 (complete this section only once for your facility)

S01 2 5 0 0 P S02 S03
 AMOUNT OF WASTE UOM AMOUNT OF WASTE UOM AMOUNT OF WASTE UOM
 S04 S05
 AMOUNT OF WASTE UOM AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION AND MANAGEMENT

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29	32	1 Ignitable; Distillation Bottoms of off-spec Product Batch	D 0 0 1 33 36 37 40 41 44 45 48	S 0 1 49 51 52	2 5 0 0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

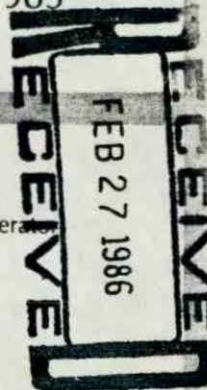
MAR 20 ENTD

XV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1985

This report is for the calendar year ending December 31, 1985
Read All Instructions Carefully Before Making Any Entries on Form



I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1985 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

- 1 Non-handler
- 2 Small Quantity Generator
- 4 Exempt
- 5 Beneficial Use
- 9 Out of Business

Please print/type with elite type (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

T/A C
F A R D 9 9 0 6 6 0 6 4 9 1 1
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

- ☐ For 1985 Only ☐ Permanently
☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF ESTABLISHMENT

V E R T A C C H E M I C A L C O R P - W E S T H E L E N A P L A N T
30 69

IV. ESTABLISHMENT MAILING ADDRESS

3 P O B O X 2 7 4 9 - H W Y 2 4 2 S O U T H
15 16 45
Street or P.O. Box
4 W E S T H E L E N A A R 7 2 3 9 0
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF ESTABLISHMENT (if different than section IV above)

5
15 16 45
Street or Route number
6
15 16 41 42 47 51
City or Town State Zip Code

VI. ESTABLISHMENT CONTACT

2 J O E E P O R T E R
15 16 45
Name (last and first)
5 0 1 - 5 7 2 - 3 7 0 1
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. W. Shackelford - Plant Manager

Print/Type Name

Title

Signature

Z-25-86

Date Signed

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

Date rec'd: _____ Rec'd by: _____

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

VIII. GENERATOR'S EPA I.D. NO.

G	A	R	D	9	9	0	6	6	0	6	4	9	1
1	2										13	14	15

Chemical Resources, Inc.

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

F	0	K	D	0	0	0	4	0	2	3	9	6
16											28	

2700 South 25th West Street
Tulsa, Ok.

XII. TRANSPORTATION SERVICES USED

1 - Missouri - Pacific Railroad - MOD 006 968 101

2 - Burlington - Northern Railroad - MND 048 341 788

3 - Chemical Resources, Inc. - OKD 000 402 396

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	32	1 Ignitable; Insecticide manufacture; mixture	0 8	D 0 0 1	9 7 6 0 4 8 0	P
		2 of water, salts, & solvent Oklahoma code: 004602;				
		3 Permethrin				
		4 Ignitable; Insecticide manufacture; mixture	0 8	D 0 0 1	2 3 1 3 5 1 4 0	P
		5 of water, salts, & solvent				
		6 Oklahoma code: 264403; Cypermethrin				
		7				
		8				
		9				
		10				
		11				
		12				

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

This report is for the calendar year ending December 31, 1985

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

TAC

Gibraltar Chemical Resources, Inc.

XI. FACILITY ADDRESS

P.O. Box 248

Hwy. 155

Winona, Tx.

XII. TRANSPORTATION SERVICES USED

1 - Gibraltar Chemical Resources - TXD 000 742 304

2 - Service Truck Line, Inc. - LAD 043 195 379

3 - Service Line, Inc. - TXD 981 148 885

XIII. WASTE IDENTIFICATION

XIII. WASTE IDENTIFICATION												
Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure						
29	32	1 Ignitable; Insecticide manufacture (Permethrin);	0 8	D 0 0 1	9 8 7 6 4 0	P						
	2	mixture of water, salts, and solvent										
	3			MAR 19 ENT								
	4	1 Ignitable; Insecticide manufacture (Cypermethrin);	0 8	D 0 0 1	2 7 4 2 5 6 0	P						
	5	mixture of water, salts, and solvent										
	6											
	7											
	8											
	9											
	10											
	11											
	12											

XIV. COMMENTS (enter information by section number—see instructions)

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

Date rec'd: _____ Rec'd by: _____

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

VIII. GENERATOR'S EPA I.D. NO.

G	A	R	D	9	9	0	6	6	0	6	4	9	1
1	2									13	14	15	

CECOS/BFI Livingston Facility

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

F	L	A	D	0	0	0	6	1	8	2	9	8
16												28

P.O. Box 669

I-12 and Hwy. 63

Livingston, LA 70754

XII. TRANSPORTATION SERVICES USED

Service Truck Line - LAD 043 195 379

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	Ignitable; kerosene based Polymer sample waste	01	D 001	1 2 2 4 0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

Date rec'd: _____ Rec'd by: _____

XV. GENERATOR'S EPA I.D. NO.

T/A/C

G	A	R	D	9	9	0	6	6	0	6	4	9	1
1	2											13	14 15

XVI. WASTE MINIMIZATION (narrative description)

PERMETHRIN AND CYPERMETHRIN PROCESSES.

SEVERAL SMALL CHANGES WITHIN THE PROCESS HAVE RESULTED IN A LESSER VOLUME OF WASTEWATER GENERATED. THESE CHANGES MAINLY CONSISTED OF SMALLER WASH VOLUMES. IN 1984, 15 POUNDS OF WASTEWATER WERE GENERATED PER POUND OF PRODUCT. IN 1985, 11.2 POUNDS OF WASTEWATER WERE GENERATED PER POUND OF PRODUCT; A 25% REDUCTION IN VOLUME. DUE TO CHANGES AND CONCURRENT REDUCTIONS IN VOLUME WHICH HAVE BEEN MADE OVER THE LAST FIVE YEARS, IT IS DOUBTFUL THAT THIS MAGNITUDE OF REDUCTION WILL BE SEEN IN 1986.

KEROSENE BASED POLYMER.

SOME REDUCTION IN VOLUME WAS MADE DUE TO RECYCLING. HOWEVER, THIS PRODUCT IS NO LONGER IN PRODUCTION AT THIS FACILITY.

PREPARED BY: JOE E. PORTER
ENVIRONMENTAL ENGINEER

Tear out here



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

November 8, 1985

PHONE: (501) 562-7444

Keith Catlett
Vertac Chemical Corporation
West Helena Plant
Post Office Box 2648
West Helena, AR 72390

Dear Mr. Catlett:

This Department has received the initial copy of the Texas hazardous waste manifest number 00110815, dated 6/12/85; and 00123531, dated 6/10/85; for shipments to Gibraltar Chemical Resources, Winona, TX.

As of this date, the final copy showing the signature and date of acceptance by the TSD facility has not been received by this Department.

Please provide the final copy of the above listed manifest to this Department within five (5) working days of receipt of this letter.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Vivian A. Lee".

Vivian A. Lee
Manifest Coordinator
Solid & Hazardous Waste Division

cc: Vince Blubaugh, Chief, Solid & Hazardous Waste Division
Mike Bates, Compliance & Technical Assistance Branch ✓



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

September 23, 1985

Mr. David Walker
Vertac Chemical Corp.
Post Office Box 2648
West Helena, AR 72390

Dear Mr. Walker:

This Department has received the initial and final copy of the Texas hazardous waste manifest number 00110840, dated 5/8/85, for a shipment to Gibraltar Chemical Resources, Winona, Texas.

Please provide the date of transporter's signature in block 17.

Please provide the above listed corrections to this Department within five (5) working days of receipt of this letter.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Vivian A. Lee".

Vivian A. Lee
Manifest Coordinator
Solid & Hazardous Waste Division

cc: Vince Blubaugh, Chief, Solid & Hazardous Waste Division
Mike Bates, Compliance & Technical Assistance Branch



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

September 16, 1985

Mr. Joe Porter, Environmental Engineer
VERTAC Chemical Corporation
P.O. Box 1648
West Helena, AR 72390

Dear Mr. Porter:

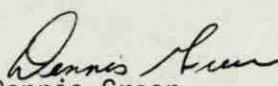
On 8/22/85 I conducted an inspection of VERTAC Chemical Corporation West Helena facility with you. The inspection was in accordance with RCRA and the Arkansas Hazardous Waste Management Act and the Rules and Regulations that pertain to these acts. The following are violations noted in completing the inspection:

- (1) There is no expected year of closure stated for the closure plan.
- (2) Time estimates for each phase of closure for each area.

The above violations need to be noted and corrected by 10/16/85. Failure to comply will be in violation of RCRA and Arkansas Hazardous Waste Management Act of 1979 as amended.

If you have any questions, please call.

Sincerely,


Dennis Green
Hazardous Waste Inspector

DG:jer

RCRA INSPECTION

SITE IDENTIFICATION

E.P.A. ID #

Date

ARD990660649

8/22/85

Site Name

Street (or other identifier)

VERTAC Chemical CORP

PO Box 2648

City

State

Zip Code

County Name

West Helena

ARK

72390

Phillips

Site Operator Information

Name

Telephone Number

Same as Above

501-522-3201

Street

City

State

Zip Code

Site Description

Custom Chemical Manufacturing

Type of Ownership

Federal

State

County

Municipal

Private

☒ Generator☐ Transporter☐ Treatment☐ Storage☐ Disposal☐ Non-generator☐ Small-generator☐ Exempted

INSPECTION INFORMATION

Principal Inspector Information

Name

Title

DENNIS G. GREEN

Hazardous Waste Inspector

Organization

Telephone No. (area code & No.)

ADPC&E

501-562-7444

Inspection Participants

JOE PORTER

Environmental Engineer

RCRA COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST

Note: On multiple part questions, circle those not in compliance.

Section A - EPA Identification NO.

1. Does Generator have EPA I.D. NO.? (262.12 - EPA I.D. No.) ☒ Yes ☐ No

a. If yes, EPA I.D. No. ARD 990660649

Section B - Hazardous Waste Determination

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste)

a. If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste No.)

☐ Yes ☒ No

(Provide waste name and description.)

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous waste.)

☒ Yes ☐ No

a. If yes, list wastes and quantities on attachment. (Include EPA Hazardous Waste No.) (Provide waste name and description)

b. Does generator determine characteristics by testing or by applying knowledge of processes? TESTING

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)?

☒ Yes ☐ No

2. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes deemed non-hazardous generated by generators? (i.e. process waste streams, collected matter from air pollution control equipment, water treatment sludge, etc.)

☒ Yes ☐ No

a. If yes, did generator determine non-hazardous characteristics by testing or knowledge of process? TESTING

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)?

☒ Yes ☐ No

2. If equivalent test methods used, attach copy of equivalent methods used.

b. List wastes and quantities deemed non-hazardous or processes from which non-hazardous wastes were produced. (Use narrative explanations sheet.) SEE ATTACHMENT

4. Are any wastes recycled, reused or reclaimed on-site?

☐ Yes ☒ No

If yes, use narrative to describe the type and quantity of the waste and the method used for reclamation.

5. Are any wastes shipped off-site for reclamation?

☒ Yes ☐ No

If yes, use narrative to describe the type and quantity of the waste and its destination. Also give a description of storage prior to shipment.

Section C - Manifest1. Does generator ship hazardous waste off-site?
(Subpart B - The Manifest)☒ Yes ☐ No

a. If no, do not fill out Section C and D.

b. If yes, identify primary off-site facility(s). (Use narrative explanations sheet.) *SEE ATTACHMENT "A"*

2. Has generator shipped hazardous waste off-site since November 19, 1980?

☒ Yes ☐ No

3. Is generator exempted from regulation because of:

Small quantity generator (261.5 - Special requirements)

☐ Yes ☒ NoORProduces non-hazardous waste at this time
(261.4 - Exclusions)☐ Yes ☒ No4. If not exempted does generator use manifest?
(262.20 - General requirements)☒ Yes ☐ Noa. If yes, does manifest include the following information (262.21 - Required information)
(Break up items or circle ones not on manifest)

1. Manifest Document No.

☒ Yes ☐ No

2. Generators Name, Mailing Address, Tele. No.

☒ Yes ☐ No

3. Generator EPA I.D. No.

☒ Yes ☐ No

4. Transporter(s) Name and EPA I.D. No.

☒ Yes ☐ No

5. a. Facility Name, Address and EPA I.D. No.

☒ Yes ☐ No

6. DOT description of the waste

☒ Yes ☐ No

7. a. Quantity (weight or volume)

☒ Yes ☐ No

b. Containers (type and number)

☒ Yes ☐ No8. Emergency Information (optional)
(special handling instructions, Phone No.)☒ Yes ☐ NoEffective 9. Waste minimization certification
9/1/85☐ Yes ☒ No *N/A*

9. Is the following certification on each manifest form?

☒ Yes ☐ No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

5. Does generator retain copies of manifests?

☒ Yes ☐ No

(Check completed manifests at random. Indicate how many manifests were inspected, how many violations were noted and the type of violation.) 20 MANIFEST CHECKED, NO VIOLATIONS

If yes, complete a through e. If questions contain more than one item, circle those not in compliance. (263.23 Use of the Manifest)

- a. (1) Did generator sign and date all manifests inspected?

☒ Yes ☐ No

(2) Who signed for generator? Name Bud OBERLE Title SHIPPER

- b. (1) Did generator obtain handwritten signature and date of acceptance from initial transporter?

☒ Yes ☐ No

(2) Who signed for transporter? Name JAMES DAVID FITCH Title AGENT

- c. Does generator retain one copy of manifest signed by generator and transporter?

☒ Yes ☐ No

- d. Do returned copies of manifest include facility owner/operator signature and date of acceptance?

☒ Yes ☐ No

- e. If copy of manifest from facility was not returned within 45 days, did generator file an exception report? (262.42 - Exception reporting)

☐ Yes ☒ No

- (1) If yes, did it contain the following information:
Legible copy of manifest.

☐ Yes ☒ No

AND

Cover letter explaining generators efforts to locate waste.

☐ Yes ☒ No

- f. Does (will) generator retain copies for 3 years?

☒ Yes ☐ No

Section D - Pre-Transport Requirements

1. Does generator package waste? ☒ Yes ☐ No

If no, skip to question 9.

If yes, complete the following questions.

Inspect containers ready for immediate shipment. If there are no such containers, skip to question 8.

2. Does generator package waste in accordance with 49 CFR 173 178, and 179? (DOT requirements) (262.30 - Packaging) ☒ Yes ☐ No

3. Are containers to be shipped leaking or corroding or bulging? ☐ Yes ☒ No

Use narrative explanations sheet to describe containers and condition. *see ATTACHMENT FOR CONTAINERS*

4. Does the generator use DOT labeling requirements in accordance with 49 CFR 172 when containers are offered for shipment? (262.31 - Labeling) ☒ Yes ☐ No

5. Does the generator mark each package in accordance with 49 CFR 172 when containers are offered for shipment? (262.32 - Marking) ☒ Yes ☐ No

6. a. Is each container of 110 gallons or less marked with the following label when containers are offered for shipment? ☒ Yes ☐ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____

Manifest Document Number _____

- b. If other labels exist, list in narrative.

7. If there are any vehicles present on-site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet. *NIA*

8. Satellite Accumulation (effective June 20, 1985)

- a. Does the generator accumulate waste in containers at or near "satellite" generation points? ☒ Yes ☐ No

If no, skip to question 9.

If yes, complete the following.

5

- b. Are containers in good condition? ☒ Yes ☐ No
- c. Is the waste compatible with the containers? ☒ Yes ☐ No
- d. Is waste transferred from leaking containers or otherwise managed to control leakage? ☒ Yes ☐ No
- e. Are containers closed? ☒ Yes ☐ No
- f. Are containers marked with the words "hazardous waste" or identification of the contents? ☒ Yes ☐ No
- g. Has waste accumulation exceeded one (1) quart of acutely hazardous waste (261.33 e.) or 55 gallons of other hazardous waste? ☐ Yes ☒ No

If yes,

1. Has the container holding the excess amount been marked with the date the excess began accumulating? ☐ Yes ☐ No
2. Have excess amounts remained in the satellite accumulation ~~N/A~~ area longer than three (3) days? ☒ Yes ☐ No

9. Accumulation Time (262.34 - Accumulation Time)

- a. Is the site a permitted/interim status storage facility? ☒ Yes ☐ No

If yes, skip to Section E, and complete and attach the TSD checklist and appropriate supplemental checklists. If no, answer rest of question #9.

- b. Is hazardous waste shipped offsite within 90 days? ☐ Yes ☒ No
- c. Is waste stored in containers or tanks? ☐ Yes ☒ No
- d. Is the beginning date of accumulation time clearly indicated on each container? ☐ Yes ☐ No
- e. Is each container or tank marked with the words "Hazardous Waste"? ☒ Yes ☐ No
- f. Complete and attach the containers/tanks supplemental checklists as appropriate.
- g. If generator accumulates waste on-site for less than 90 days, complete RCRA Generators Checklist Supplement.

Section E - Recordkeeping and Reporting

1. Is generator keeping the following reports for a minimum of three (3) years? (262.40 - Recordkeeping)

a. Manifests and signed copies from designated facilities? ☒ Yes ☐ No

b. Biennial reports (or reports as required by state agencies) ☒ Yes ☐ No

c. Exception Reports ☐ Yes ☐ No N/A

d. Test results, where applicable. ☐ Yes ☐ No N/A

2. Where are records kept (at facility or elsewhere)? FACILITY

3. Who is in charge of keeping the records? Name JOE PORTER Title ENV ENG

Section F - Special Condition

1. Has generator received from or transported to a foreign source any hazardous waste? (262.50 - International Shipments)

☐ Yes ☒ No

If yes,

a. Has a note been filed with the R.A.?

☐ Yes ☒ No

b. Is this waste manifested and signed by Foreign Consignee?

☐ Yes ☒ No

c. If generator transported wastes out of the country has he received confirmation of delivered shipment?

☐ Yes ☐ No

d. Has the generator filed an annual report (by March 1 of each year) giving the type, quantity, frequency and destination of all exported hazardous waste? (Per HSWA 1984)

☒ Yes ☐ No

RCRA COMPLIANCE INSPECTION REPORT
TSD FACILITIES CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? (265.11 - Identification Number) ☒ Yes ☐ No

A. If yes, EPA I.D. No. ARD990660649
If no, explain _____

2. Has facility received hazardous waste from a foreign source? (265.12 - Required notices) ☐ Yes ☒ No

A. If yes, has he filed a notice with the Reg. Admin. ☐ Yes ☒ No N/A

3. Has the facility received waste from off-site for recycling, reuse or reclamation? ☐ Yes ☒ No

If yes, describe waste type and amount and method to be used.

Waste Analysis

4. Has the owner/operator obtained detailed chemical and physical analyses of representative samples of all hazardous wastes prior to treating, storing or disposing of those wastes? ☒ Yes ☐ No

If yes,

- a. Have the analyses been repeated as the processes or operations generating the wastes change? ☒ Yes ☐ No

- b. For off-site facilities are analyses repeated when the waste received does not match the waste identified on the accompanying manifest?

☐ Yes ☒ No N/A

5. For off-site facilities, is each shipment of hazardous waste received at the facility inspected and if necessary, analyzed to determine if it corresponds to the waste listed on the accompanying manifest? ☐ Yes ☒ No N/A

6. Does the facility have a written waste analysis plan? (265.13 - General Waste Analysis) ☒ Yes ☐ No

a. If yes, is a copy maintained at the facility? ☒ Yes ☐ No

7. Does the waste analysis plan include the following:

a. Parameters for which each waste will be analyzed and the rationale for selection of these parameters? ☒ Yes ☐ No

b. Test methods used to test for these parameters? ☒ Yes ☐ No

- c. Sampling method used to obtain a representative sample? ☒ Yes ☐ No
- d. Frequency with which the initial analysis will be reviewed or repeated? ☒ Yes ☐ No
1. If yes, does it include requirements to re-test when the process or operation generating the waste has changed? ☒ Yes ☐ No
- e. (For off-site facilities) Waste analyses that generators have agreed to supply? ☐ Yes ☐ No N/A
- f. (For off-site facilities) Procedures which are used to inspect and analyze each shipment of hazardous waste received at the facility, including:
1. Procedures to be used to determine the identity of each movement of waste? ☐ Yes ☐ No N/A
2. Sampling method to be used to obtain representative sample of the waste to be identified? ☐ Yes ☐ No N/A
8. Does the facility provide adequate security to minimize the possibility for the unauthorized entry of persons or livestock onto the active portions of the facility? (265.14 - Security) ☒ Yes ☐ No

If no, describe the situation at the facility, document the facility's exemption under 265.14 a. (1) and (2).

If not exempt, is security provided through:

- a. 24-hour surveillance system which continuously monitors and controls entry onto the active portion? (e.g. television monitoring or guards). ☒ Yes ☐ No

OR

- b. 1. Artificial or natural barrier completely surrounding the active portion? (e.g. fence or fence and cliff)? ☒ Yes ☐ No

Describe type of security

FENCE (CHAIN LINK) AROUND ENTIRE PLANT

AND

2. Means to control entry at all times, through the gates or other entrances to the active portion (attendant, television monitors, locked entrance, controlled roadway access)? ☒ Yes ☐ No

Describe type of security.

LOCKED ENTRANCE WITH SECURITY GUARD AT GATE

Include a drawing indicating any inadequacies in the facility's security system.

- c. Is a sign with the legend, "Danger-Unauthorized Personnel Keep Out," posted at the entrance and at other locations in sufficient numbers to be seen from any approach to the active portion? (265.14 - Security) ☒ Yes ☐ No

Is it written in English and legible from at least 25 feet? ☒ Yes ☐ No

NOTE: The sign must be written in any other language predominant in the area surrounding the facility (e.g. In New Mexico and Texas areas bordering Mexico, the sign must be in Spanish).

If an existing sign with a legend other than "Danger-Unauthorized Personnel Keep Out," what does that legend say?

NIA

General Inspection Requirements

9. a. Does the owner/operator maintain a written inspection schedule? (265.15 - General Inspection Requirements) ☒ Yes ☐ No

If yes, does it contain at least schedules for inspecting the following:

1. Monitoring equipment? (If applicable) ☒ Yes ☐ No NIA
2. Safety and emergency equipment? ☒ Yes ☐ No
3. Security devices? ☒ Yes ☐ No
4. Operating and structural equipment (if applicable) ☒ Yes ☐ No

- b. Does the schedule or plan identify the types of problems to be looked for during inspection? ☒ Yes ☐ No

1. Malfunction or deterioration (e.g. inoperative sump pump, leaking fitting, eroding dike, corroded pipes or tanks, etc.) ☒ Yes ☐ No
2. Operator error ☒ Yes ☐ No
3. Discharges (e.g. leaks from valves or pipes joint breaks, etc.) ☒ Yes ☐ No

- c. Is the schedule maintained at the facility? ☒ Yes ☐ No

- d. Are these inspections conducted? ☒ Yes ☐ No

10. Does the owner/operator have an inspection log?

(265.15 - General Inspection Requirements) ☒ Yes ☐ No

- a. If yes, does it include:

1. Date and time of inspection? ☒ Yes ☐ No
2. Name of inspector? ☒ Yes ☐ No
3. Notation of observations? ☒ Yes ☐ No
4. Date and nature of repairs or remedial action? ☒ Yes ☐ No

Site Name: VERTA C WH
 I.D. Number: AR099660649

- b. Are there any malfunctions or other deficiencies noted in the inspection log that remain uncorrected?
 (Use narrative explanation sheet). Yes ✓ No
- c. Are records of the inspection log maintained at the facility for three (3) years? ✓ Yes No

Personnel Training

11. Have facility personnel successfully completed a program of classroom or on-the-job training? ✓ Yes No
- a. Does the training program include instructions in the following:
- (1) procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment ✓ Yes No
 - (2) key parameters for automatic waste feed cut-off systems ✓ Yes No
 - (3) operation of communication or alarm systems ✓ Yes No
 - (4) response to fires, explosions and groundwater contamination incidents ✓ Yes No
 - (5) shutdown of operations ✓ Yes No
 - (6) general hazardous waste management procedures ✓ Yes No
- b. Is the program directed by a person trained in hazardous waste management procedures? ✓ Yes No
- c. Have personnel completed annual training reviews? ✓ Yes No
- d. Does the owner/operator maintain the following documents:
- (1) job title, job description and name of employee for each position at the facility related to hazardous waste management ✓ Yes No
 - (2) written description of the type and amount of both introductory and continuing training ✓ Yes No
 - (3) written documentation that the training has been completed by facility personnel ✓ Yes No

Requirements for Ignitable, Reactive or Incompatible Waste

12. Does facility handle ignitable or reactive wastes?
 (265.17 - Ignitable, Reactive, Incompatible Wastes)
 (Circle appropriate type(s) of waste(s). ✓ Yes No
- a. If yes, is waste separated and confined from sources of ignition or reaction, (open flames, smoking, cutting and welding, hot surfaces, frictional heat) sparks (static, electrical or mechanical), spontaneous ignition (e.g. from heat producing chemical reactions) and radiant heat? ✓ Yes No

- b. Are smoking and open flame confined to specifically designated locations? ✓ Yes No
- c. Are "No Smoking" signs posted in hazardous areas where ignitable or reactive wastes are handled? ✓ Yes No
- d. Is waste handled in a manner which generates extreme heat, pressure, violent reaction, toxic fumes or other dangers to human health or the environment? Yes ✓ No

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and operation of facility) Yes ✓ No

If yes, use narrative explanations sheet to explain.

2. Is the facility equipped with (265.32 - Required equipment)
- a. Internal communications or alarm system
1. Is it easily accessible in case of emergency? ✓ Yes No
- b. Telephone or two-way radio to call emergency response personnel ✓ Yes No
- c. Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment? ✓ Yes No
1. Is this equipment tested to assure its proper operation? ✓ Yes No
- d. Water of adequate volume for hoses, sprinklers or water spray system ✓ Yes No
1. Describe source of water CITY OF HALLOW
2. Indicate flow rate and/or pressure and storage capacity, if available. 600 GPM

3. Is there sufficient aisle space to allow unobstructed movement of personnel and emergency equipment? (265.35- Required Aisle Space) ✓ Yes No
4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with local authorities) ✓ Yes No

If no, has the owner/operator attempted to make such arrangements?

 Yes No N/A

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with local authorities)

☒ Yes ☐ No

If yes, indicate primary authority CITY OF WEST HELONA POLICE.

- a. Is the fire department a city or volunteer fire department? CITY OF WEST HELONA.

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers?

☒ Yes ☐ No

Are they readily available to the emergency coordinator?
(265.37 - Arrangements with local authorities)

☒ Yes ☐ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility?
If no, has the owner/operator attempted to do this?
(265.37 - Arrangements with local authorities)

☒ Yes ☐ No
☒ Yes ☐ No

8. If the State, or local authorities decline to enter into the above referenced agreements, has this situation been entered in the operating record? (265.37 - Arrangements with local authorities)

☐ Yes ☒ No N/A

Section C - Contingency Plan and Emergency Procedures

1. Does the facility have a contingency plan?
(265.52 Content of Contingency Plan)

☒ Yes ☐ No

a. If yes, does it contain:

1. actions to be taken in response to emergencies? ☒ Yes ☐ No
2. description of arrangements with police, fire and hospital officials? ☒ Yes ☐ No
3. list of names, addresses, phone numbers of persons qualified to act as emergency coordinator? ☒ Yes ☐ No
4. list, including the location and physical description of all emergency equipment ☒ Yes ☐ No
5. evacuation plan for facility personnel including signals, primary and alternate routes? ☒ Yes ☐ No

2. Is a copy of the contingency plan maintained at the facility?
(265.53 - copies of contingency plan)

☒ Yes ☐ No

3. Has a copy been supplied local police, fire depts., and hospitals? (265.53 - Copies of contingency plan)

☒ Yes ☐ No

4. Has the contingency plan been updated and amended as necessary?

☒ Yes ☐ No

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5. Is the plan a revised SPCC Plan? (265.52 - content of contingency plan) ☐ Yes ☒ No
6. Is there an emergency coordinator on-site or within short driving distance of the plant at all times ☒ Yes ☐ No

If yes, list primary emergency coordinator: Joe Porter

Section D - Manifest System

1. Has facility received hazardous waste from off-site since November 19, 1980? (265.71 - Use of manifest system) ☐ Yes ☒ No
- a. If no, questions 1, 2, 3 and 4 are not applicable.
- b. If yes, does the facility retain copies of all manifests for at least three (3) years?
1. Are the manifests signed and dated and returned to the generator? ☐ Yes ☒ No
2. Is a signed copy given to the transporter? ☐ Yes ☒ No
2. Has the facility received any hazardous waste from a rail or water (bulk shipment) transporter since Nov. 19, 1980? (265.71 - Use of manifest system) ☐ Yes ☒ No
- a. If yes, is it accompanied by a shipping paper
1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☐ Yes ☒ No
2. Is a signed copy given to the transporter? ☐ Yes ☒ No
3. Has the facility received any shipments of hazardous waste since November 19, 1980, which were inconsistent with the manifest? (265.72 - Manifest discrepancies) ☐ Yes ☒ No
- a. If yes, has he resolved the discrepancy with the generator and transporter within 15 days? ☐ Yes ☒ No
1. If no, has Regional Administrator been notified in writing? ☐ Yes ☒ No
4. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (265.76 - Unmanifested waste report) ☐ Yes ☒ No
- a. If yes, has he submitted an unmanifested waste report to the Regional Administrator within 15 days? ☐ Yes ☒ No

Section E - Record Keeping and Reporting

1. Does the facility have a written operating record? (265.73 - Operating record) ☒ Yes ☐ No
- a. Is a copy maintained at the facility? ☒ Yes ☐ No

1. b. Does the record include

1. Description and quantity of each hazardous waste and the methods and dates of its treatment, storage or disposal at the facility

☒ Yes ☐ No

2. Location and quantity of each hazardous waste at each location

☒ Yes ☐ No

a. Is this information cross-referenced with specific manifest document numbers, if applicable?

☐ Yes ☒ No N/A

3. (for disposal facilities only) Location and quantity of each hazardous waste recorded on a map or diagram of each cell or disposal area?

☐ Yes ☒ No N/A

4. Record and results of waste analyses

☒ Yes ☐ No

5. Reports of incidents involving implementation of the contingency plan (If applicable)

☐ Yes ☒ No N/A

6. Records and results of required inspections

☒ Yes ☐ No

7. Monitoring, testing or analytical data where required

☐ Yes ☒ No N/A

8. Closure cost estimates and for disposal facilities, post-closure cost estimates

☒ Yes ☐ No

2. Has the owner/operator submitted biennial reports as required?

☒ Yes ☐ NoSection F - Plans and Reports

1. Have all plans and reports been visually inspected and/or been made available for inspection? (265.74 - Availability, retention and disposition of records)

☒ Yes ☐ No

List plans and/or reports not made available for inspection. If reports are accessible and not made available for inspection, explain.

N/A

2. Did operator provide inspector with a drawing of the facility?

☒ Yes ☐ Noa. If yes, please indicate which are hazardous waste facilities on the drawing. See Attachment "C"

3. Indicate Types of hazardous waste facilities.

- ☒ Containers
- ☒ Tanks
- ☐ Surface Impoundments
- ☐ Waste Piles
- ☐ Land Treatment
- ☐ Landfill
- ☐ Incinerator
- ☐ Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment
- ☐ Groundwater Monitoring Program
- ☒ Closure

CONTAINERS STORAGE CHECKLIST
(Subpart I - Use and Management of Containers 265.170)

1. Does the facility store hazardous waste in containers? ☒ Yes ☐ No

If no, do not complete this form.

2. Are the containers in good condition?
(check for leaks, corrosion, bulges, etc.) ☒ Yes ☐ No

If no, explain in narrative and document with photograph.

3. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? ☒ Yes ☐ No

4. Is the waste compatible with the containers and/or its liner? ☒ Yes ☐ No

If no, explain in narrative.

5. Are the stored containers closed? ☒ Yes ☐ No

If no, explain in narrative.

6. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? ☐ Yes ☒ No

If yes, explain in narrative.

7. Are each of the containers inspected at least weekly? ☒ Yes ☐ No

If no, explain in the narrative the frequency of inspection.

8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? ☒ Yes ☐ No

If no, explain in narrative and document with photograph.

9. Are incompatible wastes stored in the same containers? ☐ Yes ☒ No

If yes, explain in narrative.

10. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? ☐ Yes ☐ No N/A

If no, explain in narrative.

Subpart J - Tanks (265.190)

NOTE: If multiple tanks exist, list each tank and specify compliance or non-compliance. Complete an individual checklist for each tank not in compliance and a collective checklist for those in compliance.

1. Are there any tanks which are not being used which the facility no longer plans to use? Yes ✓ No

a. If yes, has all hazardous waste and hazardous waste residue been removed from these tanks, discharge control equipment, and discharge confinement structures? Yes No N/A

2. Are tanks presently used to treat or store waste? ✓ Yes No

- a. If no, do not complete rest of form.
b. If yes, check tanks.

3. Is there evidence that wastes placed in the tank are incompatible with the tank or liner? Yes ✓ No

NOTE: Any evidence of ruptures, leaks or corrosion. (Use narrative explanations sheet.)

4. Are there any uncovered tanks? Yes ✓ No

a. If no, do not complete 4b.-e.
b. If yes, do they have 2 feet (60cm) freeboard? Yes N/A No

c. A containment structure? (e.g. dike or trench) or N/A Yes No

d. A drainage control system? N/A Yes No

e. A diversion structure? (e.g. standby tank) Yes No N/A

(NOTE: The structure in c, d or e must have a capacity that equals or exceeds the volume of the top 2 feet (60 cm) of the tank.)

If the answers to 4b.-e. are "no", explain current conditions using narrative sheets.

5. Are any of the tanks continuous feed? ✓ Yes No

a. If yes, is it equipped with a means to stop inflow (e.g. waste feed cutoff or by-pass to a stand-by tank)? ✓ Yes No

Waste Analysis and Trial Tests

6. a. Has the tank been used to treat or store a hazardous waste substantially different from the waste previously treated or stored in the tank?

ORYes ☒ No

- b. Has a chemical treatment process been used in the tank which was substantially different than any previously used in the tank?

Yes ☒ No

a. or b. is yes,

1. Were waste analyses and trial treatment or storage tests conducted prior to the change?

ORYes ☒ No N/A

2. Was written, documented information obtained on similar storage or treatment of similar wastes under similar conditions?

Yes ☒ No N/AInspections

7. Does the owner/operator inspect the following at least daily, where present?

☒ Yes ☐ No

(Indicate which items are present in 7 and 8.)

- a. Discharge control equipment (e.g. waste feed cut-off, by pass and/or drainage systems)?

☒ Yes ☐ No

- b. Monitoring equipment (e.g. pressure and temperature gages)?

☒ Yes ☐ No

- c. Level of waste in each uncovered tank?

Yes ☒ No N/A

8. Does the owner/operator inspect the following at least weekly?

☒ Yes ☐ No

- a. Construction materials of tanks for corrosion or leaks?

☒ Yes ☐ No

- b. Construction materials of and area surrounding discharge confinement structures for erosion or signs of leakage?

☒ Yes ☐ No

9. What is the procedure for assessing the condition of the tank?

Visual Inspections

Explain in narrative. (e.g. How does the procedure allow for detection of cracks, leaks or corrosion or procedures for emptying the tank to allow entrance, etc.)

Site Name: VERTAC W 4
 I.D. Number: APD99066649

11. Are ignitable or reactive wastes placed in tanks?

☒ Yes ☐ No

- a. If yes, are they treated, rendered or mixed before or immediately after placement in the tank so it no longer meets the definition of ignitable or reactive?

☐ Yes ☒ No

OR

- b. Is the waste protected from sources of ignition or reaction?

☒ Yes ☐ No

1. If yes, use narrative explanations sheet to describe separation and confinement procedures. *SEE ATTACHMENT "B"*
2. If no, use narrative explanations sheet to describe sources of ignition or reaction

OR

- c. Is the tank used solely for emergencies?

☐ Yes ☒ No

12. Has the facility ever placed incompatible wastes in the tank?

☐ Yes ☒ No

- a. If yes, what were the results. (Use narrative explanations sheet). (Look for signs of mixing of incompatible wastes, e.g. fire, toxic mist, heat generation, bulging containers, etc.)

13. If a waste is to be placed in a tank that previously held an incompatible waste, was that tank washed?

☐ Yes ☒ No *NIY*

- a. If yes, describe washing procedures (Use narrative explanation sheet.)

Describe how it is possible for incompatible wastes to be placed in the same tank. (Use narrative explanations sheet.)

ARD 790660649

VERTAL West Helena

8/22/85

Closure Checklist.

Closure Procedures will cover two areas, (1) TANKS & (2) CONTAINER STORAGE. The Surface Impoundment is ~~NO~~ longer a RCRA FACILITY. The TANKS will be removed to an acceptable disposal facility. The TANKS AND associated piping will then be washed AND the washings placed in the TANKS OR IN DRUMS. LABORATORY ANALYSIS will indicate whether the material is acceptable for on-site disposal in the BIOLOGICAL TREATMENT SYSTEM OR if it must be shipped off-site. MAXIMUM INVENTORY OF TANK WASHINGS is ESTIMATED AT 12,000 GALLONS. The 55-GAL CONTAINERS will be removed from the site to an appropriate off-site disposal facility. The CONTAINER AREA will then be washed AND RESIDUES generated will be collected AND held IN CONTAINERS FOR IMMEDIATE LABORATORY ANALYSIS. IF ANALYSIS INDICATES THE MATERIAL TO be HAZARDOUS, these CONTAINERS will also be shipped to an acceptable disposal facility. IF ANALYSIS shows NO EVIDENCE OF CONTAMINATION, WASTE WATER will be discharged to the BIOLOGICAL TREATMENT SYSTEM. A MAXIMUM OF 500 GALLONS OF WASHINGS is EXPECTED.

The Closure Cost Estimate FROM VERTAL is ^{\$1}25,400.

The PCAE Estimate using the PAPER REID FORMULA
\$25,553.40.

Closure

A. Does the facility have a closure plan?

☒ Yes ☐ No

1. Does the plan include:

a. A description of how and when the facility will be partially, then finally closed?

☐ Yes ☒ No NIA

b. An up-to-date estimate of the maximum inventory of wastes in storage and treatment at any time during the life of the facility?

☒ Yes ☐ No

c. A description of decontamination procedures for facility equipment?

☒ Yes ☐ No

d. An estimate of expected year of closure?

☐ Yes ☒ No

2. Does the plan include a schedule for final closure? If yes, does it include:

☒ Yes ☐ No

a. Time estimates for each phase of closure for each area?

☐ Yes ☒ No

b. Total time estimate for closure?

☒ Yes ☐ No

3. Using narrative explanations sheet, give a brief summary of how the facility plans to close each area of hazardous waste management; or attach a copy of the closure plan. See Attachment "B"

4. Does the plan address all areas of hazardous waste management?

☒ Yes ☐ No

5. Has the plan been amended as necessary to reflect changes in facility operations or design?

☒ Yes ☐ No

6. Are cost estimates available and modified as necessary? If yes, give latest cost estimate and date of adjustments. See Attachment "B"

☒ Yes ☒ No AN

B. Have closure activities begun at the facility?

☐ Yes ☒ No

1. If yes,

a. Was the closure plan submitted to the Regional Administrator at least 180 days prior to beginning these activities?

☐ Yes ☒ No

b. Were all wastes treated or disposed of within 90 days of the final receipt of wastes?

☐ Yes ☒ No

NIA

If no, give explanation including waivers or extensions granted by Regional Administrator.

☐ Yes ☒ No

- c. Do the actual closure activities correspond to those written in the closure plan?

☐ Yes ☒ No

If no, include narrative explanation.

2. Was closure completed within 180 days of receipt of final volume of wastes?

☐ Yes ☒ No

If no, give explanation, including waivers or extensions granted by the Regional Administrator.

☐ Yes ☒ No

3. At completion, did the facility submit a certification of closure to the Regional Administrator? If yes, was it signed by both the owner/operator and an independent registered professional engineer?

☐ Yes ☒ No

☒ Yes ☐ No

Attachment "A"

ARD990660649

VERAC WEST Helena

8/22/85

Sec "B"

HAZARDOUS WASTE GENERATED. PROCESS WASTEWATER; SPENT
PROCESS SOLVENT PERMETHRIN PROCESS Dool. 8,729,240 POUNDS.
PROCESS WASTEWATER; SPENT SOLVENT; CYPERMETHRIN PROCESS Dool
2,014,3170 POUNDS. PROCESS WASTE WATER; SPENT SOLVENT PER
METHRIN AND CYPERMETHRIN PROCESS Dool 6,043,840 POUNDS.
POLYMER SAMPLE WASTE; COMBUSTIBLE LIQUID Dool 6,4051 POUNDS.

NON-HAZARDOUS WASTE GENERATED. PROPANOIC ACID used IN
MAKING PROPANIL WASTE. THIS WASTE IS NEUTRALIZED
AND SENT TO WASTE WATER TREATMENT SYSTEM 75,000 GALS/YR.

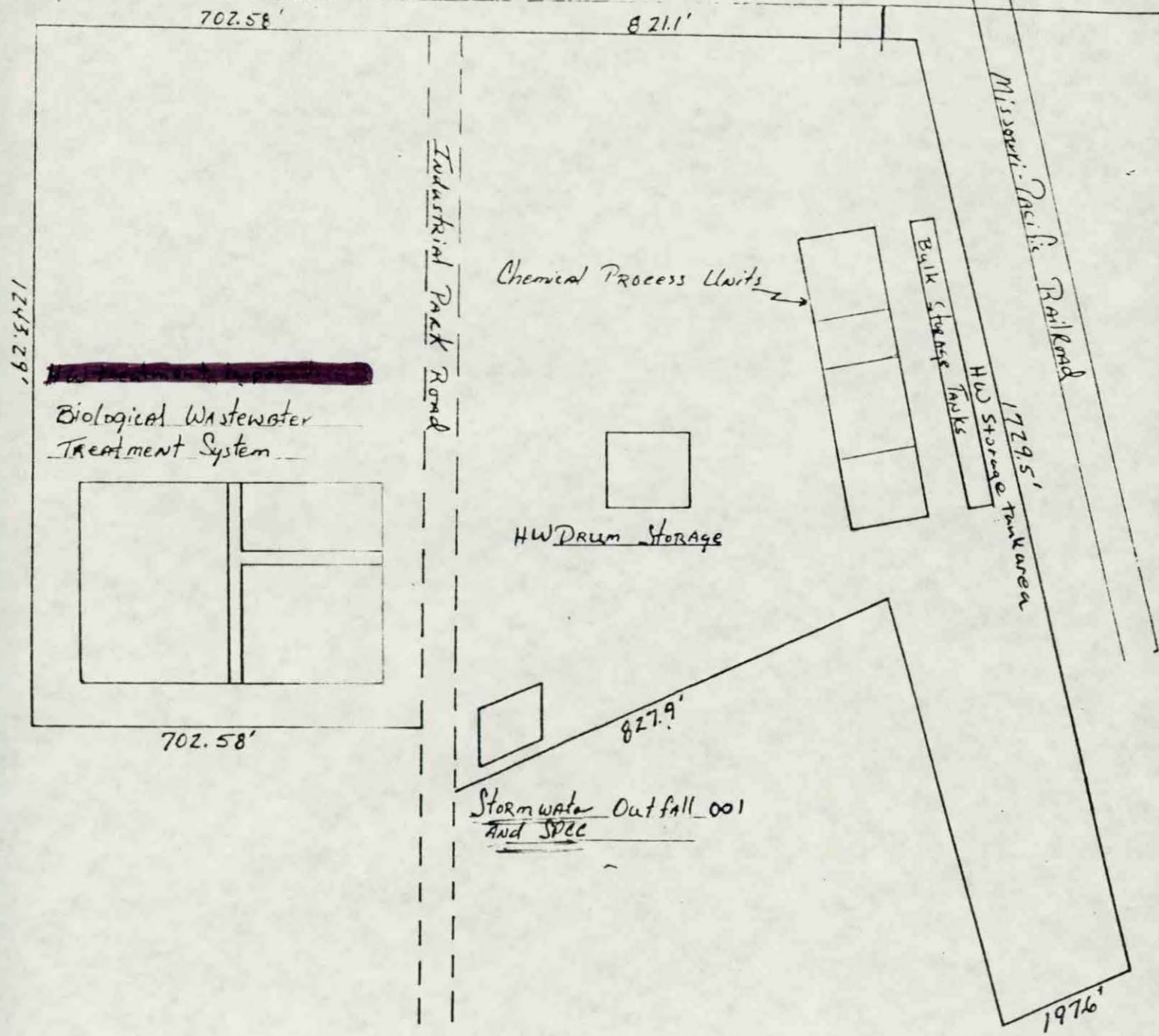
Sec "C"

MANIFEST. FACILITIES USED. Chemical Resources INC,
2904 Fourth NATIONAL BANK BUILDING TULSA, OK. GIBRAL-
TOR WASTEWATERS, INC. PO BOX 1640 KILGORE, TX 75662
FACILITY LOCATED AT HWY 155. WINONA, TX 75792.
CECOS. PO BOX 669-112 & HWY 63 LIVINGSTON, ^{OR} LA
70754.

REPLY TO P. O. BOX 2648
WEST HELENA, AR 72390
(501) 572-3701

To Hwy 49

SH-49 242



J.E. Porter 11/80



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

Bates

PHONE: (501) 562-7444

August 16, 1985

Mr. Bud Oberle
Vertac Chemical Corporation
P. O. Box 2648
Highway 242 South
West Helena, AR 72390

Dear Mr. Oberle:

This Department has received correspondence from the Oklahoma Department of Health which indicates that Vertac Chemical Corporation, West Helena, AR has not filled out Oklahoma hazardous waste manifest numbers 14566, dated 6-14-85, 14561, dated 6-5-85, and 14565, dated 6-14-85, in a manner acceptable to the State of Oklahoma.

The total quantity is missing from block 13 on manifest 14565.

The total quantity on 14561 in block 13 appears to be in pounds. However, the units indication should be P (for pounds), unless the quantity is in gallons, in which case GA would be used.

The units in block 14 on 14566 indicates that the 20,264 lbs. should be 20,264 gallons.

Please be advised that Oklahoma regulations may be more stringent than Arkansas, and corrections made on the manifest may be questioned by Oklahoma officials.

Please provide a written explanation and corrected manifests for the above listed manifests to this Department within five (5) working days of receipt of this letter.

If you have any questions, please let me know.

Sincerely,

Vicky Prewett
Administrative Assistant
Solid and Hazardous Waste Division

cc: Mike Bates, CTA
Vince Blubaugh, Chief, SHWD
State of Oklahoma



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

July 30, 1985

Mr. Carnell McGinister
Vertac Chemical Corp.
Post Office Box 2648
West Helena, AR 72390

Dear Mr. McGinister:

This Department has received the initial and final copy of the Texas hazardous waste manifest number 110832, dated 5/27/85, for a shipment to Gilbralter Chemical Resources, Winona, Texas.

The following correction is required:

1. The EPA identification number listed in block 10 does not correspond with our records. We show the number as "TXD000742304." Please correct.

Please provide the above listed correction to this Department within five (5) working days of receipt of this letter.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Vivian A. Lee".

Vivian A. Lee
Manifest Coordinator
Solid & Hazardous Waste Division

cc: Vince Blubaugh, Chief, Solid & Hazardous Waste Division
Mike Bates, Compliance & Technical Assistance Branch ✓



File

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

May 20, 1985

Mr. Bud Oberle
Vertac Chemical Corp.
Post Office Box 2648
West Helena, AR

Dear Mr. Oberle:

This Department has received the initial copy of the Oklahoma hazardous waste manifest number 14521, dated 4/22/85, for a shipment to Chemical Resource, Inc., Tulsa, OK.

Please provide the EPA identification number for the TSD facility in Block 10.

Please provide the above listed correction to this Department within five (5) working days of receipt of this letter.

If you have any questions, please contact me.

Sincerely,

Vivian Lee

Vivian A. Lee
Manifest Coordinator
Solid & Hazardous Waste Division

cc: Vince Blubaugh, Chief, Solid & Hazardous Waste Division
Mike Bates, Compliance & Technical Assistance Branch



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

April 1, 1985

Mr. Joe Porter
Vertac Chemical Corp.
P. O. Box 2648
Highway 242 South
West Helena, AR 72390

Dear Mr. Porter:

This Department has received the following initial copies of Oklahoma hazardous waste manifests for which no final copies have been received:

5349, dated 2-21-85
5359, dated 2-25-85
5360, dated 2-27-85
5361, dated 2-27-85
5347, dated 2-18-85
5330, dated 2-18-85
5329, dated 2-18-85
5362, dated 2-28-85

Please provide the final copies, or photo-copies, for the above listed manifests to this Department within five (5) working days of receipt of this letter.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Vicky Prewett".

Vicky Prewett
Administrative Assistant
Solid and Hazardous Waste Division

cc: Vince Blubaugh, Chief, SHWD
Mike Bates, CTA



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

February 8, 1985

PHONE: (501) 562-7444

Mr. Bud Oberle
Vertac Chemical Corporation
Post Office Box 2648
Hwy 242 South
West Helena, Arkansas 72390

Dear Mr. Oberle:

This Department is in receipt of the initial copy of Arkansas hazardous waste manifest number AR-53373, dated 10/3/84, for a shipment to Chemical Tesources, Inc. of Tulsa, Oklahoma.

As of this date, the final copy showing the signature and date of acceptance by the TSD facility has not been received.

Please provide the final copy, or a photocopy, to this Department within five (5) working days of receipt of this letter.

Your cooperation is appreciated. Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Vivian A. Lee".

Vivian A. Lee
Manifest Coordinator
Solid & Hazardous Waste Division

cc: Vince Blubaugh, Chief, Solid & Hazardous Waste Division
Mike Bates, Compliance and Technical Assistance Branch ✓



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

April 2, 1984

Mr. Joe Porter
Vertac Chemical Corp.
P. O. Box 2648
West Helena, AR 72390

Dear Mr. Porter:

This Department has received the initial copy of Oklahoma hazardous waste manifest number 52878, dated 11-30-83, for a shipment from Vertac to Chemical Resources, Tulsa, OK.

As of this date, the final copy of Oklahoma # 52878 has not been received by this Department.

Please provide the final copy, or a photo-copy, showing the signature and date of acceptance by the TSD facility for 52878 within five (5) working days of receipt of this letter.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in cursive script, reading "Vicky Prewett", is written over the typed name.

Vicky Prewett
Manifest Coordinator
Solid and Hazardous Waste Division

cc: Vince Blubaugh, Chief, SHWD
Files

GENERAL INSTRUCTIONS: If you received a preprinted label attached to the mailing envelope in which this form was enclosed, affix it in the space provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If the information is correct and complete, leave Sections I, II, and III below blank. If you did not receive a preprinted label, complete all sections. REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM. The information requested in this report is required by law (Section 3004 of the Resource Conservation Recovery Act).

I. FACILITY EPA I.D. NUMBER

[illegible]

V e r t a c | C h e m i c a l | C o r p . | W e s t | H e l e n a | P l a n t

3. P O B o x 2 6 4 8 | H w y | 2 4 2 | S o u t h | | | | |
15 16 45

14 West Helena AR 72390
15 16 41 42 47 51
City or Town State Zip Code

A horizontal number line with tick marks every 1 unit. The numbers 15, 16, and 45 are labeled at the bottom. The line starts at 15 and ends at 45.

15 16 41 42 47 51
City or Town State Zip Code

2 Porter Joe E. 45
15 16
Name (last and first)

5 0 1 — 5 7 2 — 3 7 0 1
46 55

\$, 1 5 6 , 0 0 0
16 19 22

\$, 1 2 5 , 0 0 0

Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J.W. Shackelford - Plant Manager

Print Type Name

Title

Signature of Authorized Representative

2/29/84
Date Signed

Do not make entries in shaded areas

ARKANSAS DEPARTMENT OF POLLUTION CONTROL & GEOLOGY
Facility Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. FACILITY'S EPA I.D. NO.

T/A C

F A R D 9 9 0 6 6 0 6 4 9 1
1 2 13 14 15

Date received: _____

Received by: _____

IX. GENERATOR'S EPA I.D. NO.

G I A R D 9 9 0 6 6 0 6 4 9
16 28

X. GENERATOR NAME (specify generator from whom all wastes on this page were received)

XI. GENERATOR ADDRESS

Vertac Chemical Corp. - West Helena Plant

XII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29	32	1 Process Wastewater; Blowdown; Stormwater	D 0 0 2 33 36 37 40 41 44 45 48 49 51 52 60 61	T 6 8	2 0 5 0 7 9 8 0 0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIII. COMMENTS (enter information by section number—see instructions)

Reference: Line 1 - Represents the total amount of process wastewater, boiler and cooling tower blowdown, and stormwater treated and discharged under NPDES Permit no. AR-003-6412; 24,589,904 gallons.

ARKANSAS DEPARTMENT OF POLLUTION CONTROL & ECOLOGY
GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983.

AFFIX LABEL HERE

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/A C

[illegible]

II. NAME OF INSTALLATION

Vertical Chemical Corp. - Weisitz Helena, Idaho

III. INSTALLATION MAILING ADDRESS

3 | P | O | B | o | x | 1 | 2 | 6 | 4 | 8 | - | H | w | y | 1 | 2 | 4 | 2 | S | o | u | t | h | | | | |

Street or P.O. Box

4 West Helena AIR 7 2 3 9 0
15 16 41 42 47 51
City or Town State Zip Code

IV. LOCATION OF INSTALLATION (if different than section III above)

A number line starting at 15 and ending at 45. There are tick marks every 1 unit. The number 5 is written in a box above the tick mark for 15.

Street or Route number

15 16 41 42 47 51
 City or Town State Zip Code

V. INSTALLATION CONTACT

Porter, Joe E

Name (last and first)

5 | 0 | 1 | 1 | - | 5 | 7 | 2 | - | 3 | 7 | 0 | 1 | 1 |
46 55
Phone No. (area code & no.)

VI. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J.W. Shackelford - Plant Manager

Print/Type Name

Title

Signature of Authorized Representative

Date Signed _____

Do not make entries in shaded areas

ARKANSAS DEPARTMENT OF POLLUTION CONTROL & ECOLOGY Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VII. GENERATOR'S EPA I.D. NO.

GA RD 9 9 0 6 6 0 6 4 9 1 1
1 2 13 14 15

IX. FACILITY'S EPA I.D. NO.

OKD 0 0 0 4 0 2 3 9 6
16 28

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chemical Resources, Inc.

X. FACILITY ADDRESS

2904 Fourth Nat'l Bank Building
Tulsa, OK

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during 1981. This section to be completed only once. Do not repeat on supplemental sheets.)

Chemical Resources, Inc.
OKD 000-402-396

XII. WASTE IDENTIFICATION

Sequence	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1	Process wastewater; spent process solvent; Permethrin pro	0 8 35 38 39 42	D 0 0 0 D 0 0 1	8 7 2 9 2 4 0	P
2	2	Process wastewater; spent solvent; Cypermethrin Process	0 8	D 0 0 0 D 0 0 1	2 0 1 4 2 1 7 0	P
3	3					
4	4					
5	5					
6	6					
7	7					
8	8					
9	9					
10	10					
11	11					
12	12					

XIII. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ARKANSAS DEPARTMENT OF POLLUTION CONTROL & ECOLOGY Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VII. GENERATOR'S EPA I.D. NO.

T/A C
G A R D 9 9 0 6 6 0 6 4 9 1
1 2 13 14 15

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Gibraltar Wastewaters, Inc.
TXD 000-742-304

X. FACILITY ADDRESS

P.O. Box 1640 - Kilgore, TX 75662
Hwy 155 - Winona, TX 75792

IX. FACILITY'S EPA I.D. NO.

T X D 0 0 0 7 4 2 3 0 4
16 28

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during 1981. This section to be completed only once. Do not repeat on supplemental sheets.)

- (1) Gibraltar Wastewaters, Inc. TXD-000-742-304
- (2) Mobley Company, Inc. TXD-000-807-925

XII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1	Process wastewater; spent solvent; Permethrin and	0 8 35 38 39 42 33 34 43 46 47 50 51	D 0 0 0 0 D 0 0 1	6 0 4 7 8 4 0	P
2	2	Cypermethrin Process				- 60
3	3					
4	4					
5	5					
6	6					
7	7					
8	8					
9	9					
10	10					
11	11					
12	12					

XIII. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ARKANSAS DEPARTMENT OF POLLUTION CONTROL & ECOLOGY Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd:

Rec'd by:

VII. GENERATOR'S EPA I.D. NO.

T/A C

GA RD 91910616064911
1 2 13 14 15

IX. FACILITY'S EPA I.D. NO.

FL AD 010106118121918
16 28

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Browning-Ferris Industries

X. FACILITY ADDRESS

P.O. Box 669 - 112 and Hwy 63
Livingston, Louisiana 70754

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during 1981. This section to be completed only once. Do not repeat on supplemental sheets.)

Browning-Ferris, Industries LAT-230-012-999


XII. WASTE IDENTIFICATION

Sequence	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Polymer sample wastes; combustible liquid	0135	D001383942	64051	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIII. COMMENTS (enter information by section number—see instructions)

Fill-in areas are spaced for elite type, i.e., 12 characters/inch. *Rev. 9-80 11-20-80* Form Approved OMB No. 156-001-75

FORM
1
GENERAL



U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

EPA I.D. NUMBER
AR D9 9 06 6 06 4 9
D

GENERAL INSTRUCTIONS
If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

I. EPA I.D. NUMBER

ARD990660649

III. FACILITY NAME

EAGLE RIVER CHEMICAL CORP

V. FACILITY MAILING ADDRESS

PO BOX 2648
WEST HELENA

VI. FACILITY LOCATION

HWY #242
WEST HELENA

AR 72390

AR 72390

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		XX	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	XX		
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	XX		XXX
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		XX	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		XX	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		XX	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		XX	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		XX	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		XX	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		XX	

III. NAME OF FACILITY

1 SKIP

VE, RT, A, C, C, H, E, M, I, C, A, L, C, O, R, P, - W, E, S, T, H, E, L, E, N, A, P, L, A, N, T

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)

2 PORTER, JOE E. ENVIRONMENTAL ENGINEER

B. PHONE (area code & no.)

501 572 3701

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 P. O. BOX 2648

B. CITY OR TOWN

WEST HELENA

C. STATE

AR

D. ZIP CODE

72390

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 HIGHWAY 242, SOUTH

B. COUNTY NAME

PHILLIPS

C. CITY OR TOWN

WEST HELENA

D. STATE

AR

E. ZIP CODE

72390

F. COUNTY CODE (if known)

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				SECOND			
C	7	2865	(specify)	C	7	2869	(specify)
ORGANIC CHEMICALS				ORGANIC CHEMICALS			
C. THIRD				D. FOURTH			
C	7	2879	(specify)	C	7		(specify)
PESTICIDES							

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?	
B VERTAC CHEMICAL CORPORATION												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)												D. PHONE (area code & no.)	
F = FEDERAL S = STATE P = PRIVATE				M = PUBLIC (other than federal or state) O = OTHER (specify)				(specify)		C A		9.01 767 6851	
E. STREET OR P.O. BOX													
5 100 POPLAR AVENUE													
F. CITY OR TOWN								G. STATE		H. ZIP CODE		IX. INDIAN LAND	
B MEMPHIS								TN		38137		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)						D. PSD (Air Emissions from Proposed Sources)					
C	T	I				C	T	I			
9	N		AR0036412			9	P				
B. UIC (Underground Injection of Fluids)						E. OTHER (specify)					
C	T	I				C	T	I			
9	U					9			1.2.6A		
C. RCRA (Hazardous Wastes)						E. OTHER (specify)					
C	T	I				C	T	I			
9	R		ARD990660649			9			1963W		

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

A. VERTAC CHEMICAL PRODUCTS:		(1) PROPANIL (3,4-DICHLOROPROPIONANILIDE) A RICE HERBICIDE
		(2) BENZENE SULFONYL CHLORIDE
B. CONTRACT MANUFACTURE (TOLL AGREEMENTS)		(1) PERMETHRIN, TECHNICAL-FOR ICI AMERICAS
		(2) LANNATE INSECTICIDE FOR DUPONT (3) DRA (DRAG REDUCTION AGENT) A KEROSENE BASED POLYMER FOR ARCO CHEMICAL (DIVISION OF ATLANTIC RICHFIELD)
C. FACILITY IS A MULTI-PURPOSE BATCH OPERATION.		

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE	C. DATE SIGNED
R.A. GUIDI VICE PRESIDENT		<i>[Signature]</i>	Nov. 18, 1980

COMMENTS FOR OFFICIAL USE ONLY

C	
13	14



FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)☐ 2. NEW FACILITY (Complete item below.)

C	YR.	MO.	DAY
8	69	06	06
15	73 74	75 76	77 78

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
73 74	75 76	77 78

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS

Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

Treatment:

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR

OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)

T04 GALLONS PER DAY OR
LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U

UNIT OF MEASURE	UNIT OF MEASURE CODE
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H

UNIT OF MEASURE	UNIT OF MEASURE CODE
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S									
C									
DUP									
T/A C									
1 2 13 14 15									
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEA- SURE (enter code)				1. AMOUNT	2. UNIT OF MEA- SURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	T 0 2	90,000	U		7				
2	S 0 1	20,000	G		8				
3	S 0 2	93,000	G		9				
4	T 0 1	90,000	U		10				

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY										
WARD990660649															DUP										
131415															1314152324										
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)					B. ESTIMATED ANNUAL QUANTITY OF WASTE					C. UNIT OF MEASURE (enter code)	D. PROCESSES													
												1. PROCESS CODES (enter)					2. PROCESS DESCRIPTION (if a code is not entered in D(1))								
	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	
1	F	0	0	2		110,000					P			S	0	1	S	0	2	T	0	2			
2	F	0	0	5		1,200,000					P			S	0	1	S	0	2	T	0	2			
3	P	0	6	6		2,200,000					P			T	0	2									
4	P	1	0	6		120,000					P			S	0	1	S	0	2	T	0	1	T	0	2
5	F	0	0	2																				Included in above	
6	D	0	0	0																				Included in above	
7	U	0	2	0		80,000,000					P			S	0	1	S	0	2	T	0	1	T	0	2
8	F	0	0	5																				Included in above	
9	U	2	2	0		1,200,000					P			S	0	1	S	0	2						
10	F	0	0	5																				Included in above	
11	D	0	0	0		31,000,000					P			S	0	1	S	0	2	T	0	1	T	0	2
12	D	0	0	1		300,000					P			S	0	1	S	0	2						
13																									
14																									
15																									
16																									
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22																									
23																									
24																									
25																									
26																									

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04") FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Further explanation of line No. 1 of Part III:

Biological treatment system. Total volume capacity is 12.6MM gallons.
Working volume is 6.6MM gallons. Design throughput is 90M gallons
per day. NPDES Permit No. AR-003-6412.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. WZ	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)		D. PROCESSES							
	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))						
X-1	K	0	5	4	900		P	T	0	3	D	8	0		
X-2	D	0	0	2	400		P	T	0	3	D	8	0		
X-3	D	0	0	1	100		P	T	0	3	D	8	0		
X-4	D	0	0	2											included with above



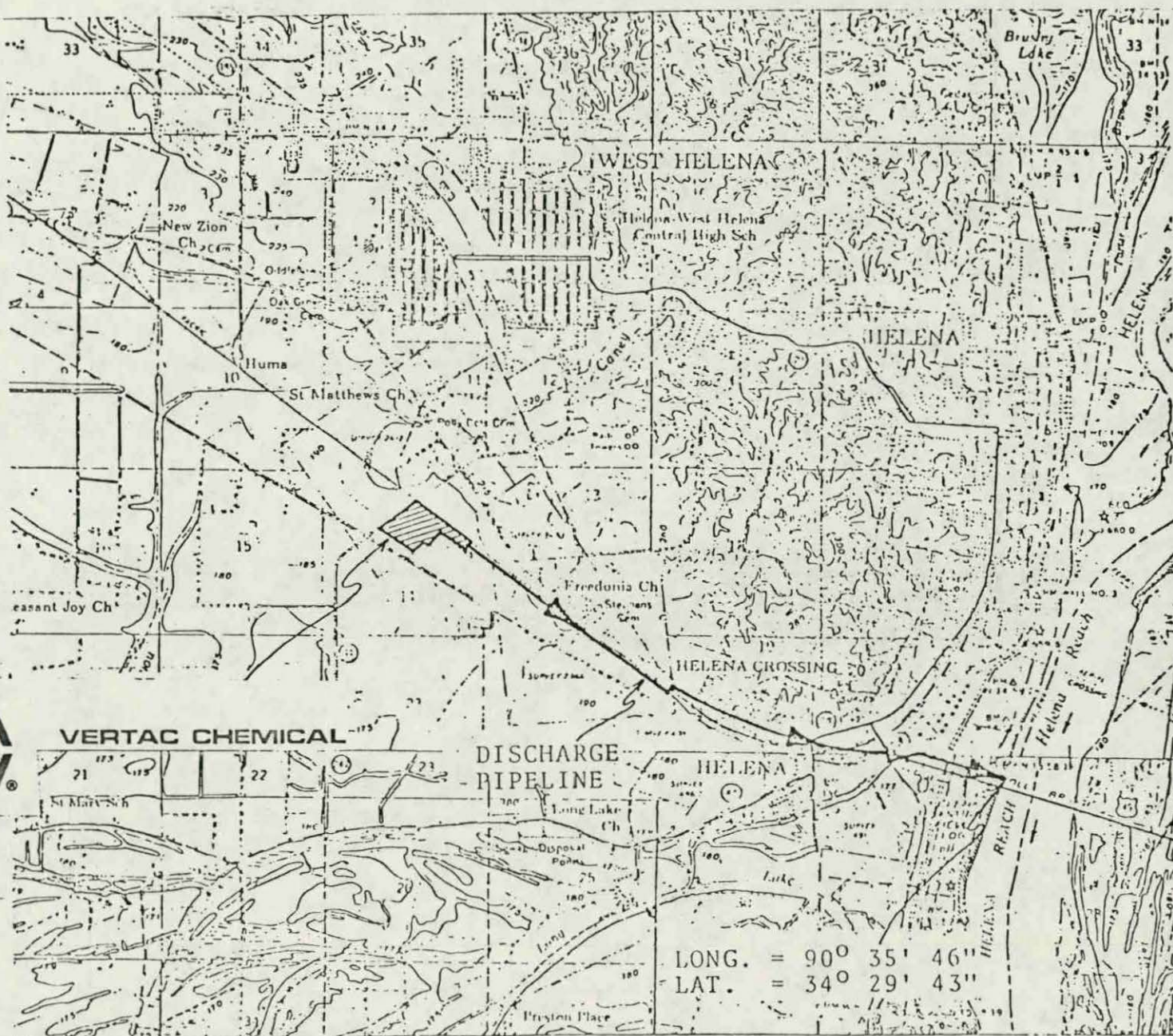
VERTAC CHEMICAL CORPORATION

24th Floor • 5100 Poplar • Memphis, TN 38137 • 901-767-6851

REPLY TO: P. O. BOX 2648

WEST HELENA, AR 72390

(501) 572-3701



NPDES Outfall 002

LOCATION MAP (EXCERPT FROM BELOW)

Mapped and edited by the Mississippi River Commission
Published by the Geological Survey

Control by USGS, USC&GS, and USCE

Topography by photogrammetric methods from aerial
photographs taken 1960, and planimetric surveys 1930-1949
and 1961. Field checked 1961

Polyconic projection 1927 North American datum
10 000 foot grids based on Arkansas coordinate system, south
zone, and Mississippi coordinate system, west zone
1000 meter Universal Transverse Mercator grid ticks,
zone 15, shown in blue

Red tint indicates area in which only landmark buildings are shown

SCALE: 1:62500

MARCH 26, 1976

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 1

EPA I.D. NO. (enter from page 1)

9	8	7	6	5	4	3	2	1	T/A/C
F	A	R	D	9	9	0	6	6	0
1	2	3	4	5	6	7	8	9	6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

3	4	3	1	7	5
65	66	67	68	69	71

9	0	3	8	7	9
72	74	75	76	77	79

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

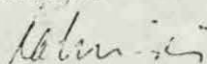
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

R. A. Guidi
Vice President

B. SIGNATURE



C. DATE SIGNED

Nov. 18, 1980

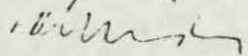
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

R. A. Guidi
Vice President

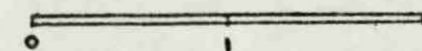
B. SIGNATURE



C. DATE SIGNED

Nov. 18, 1980

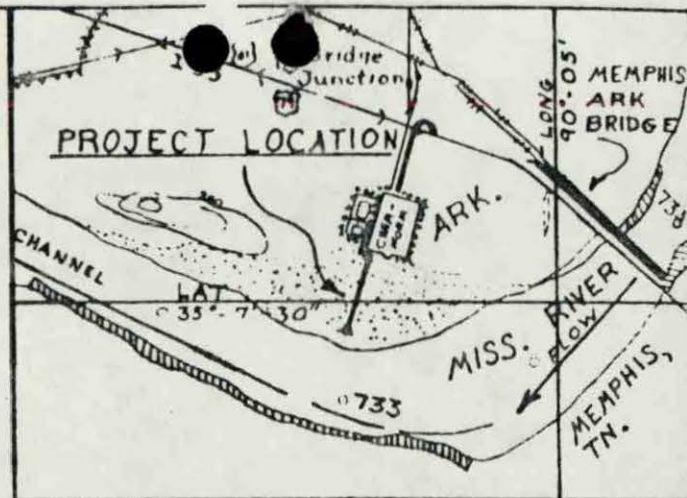
1a VICINITY MAP



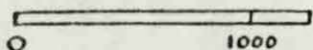
SCALE: 1" = 1 MILE



FROM CORPS OF ENGRS. NAVIGATION MAP 14

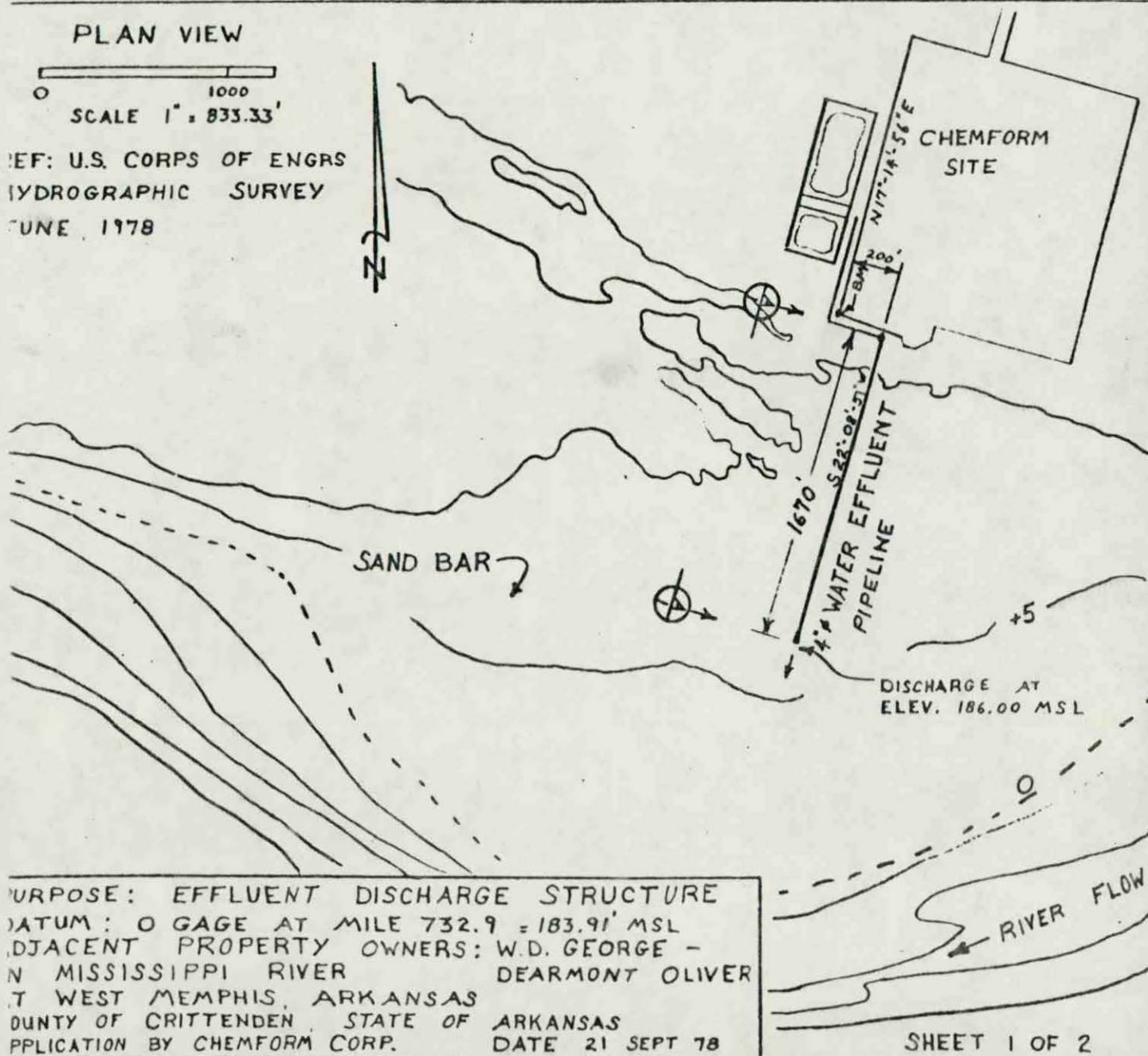


PLAN VIEW



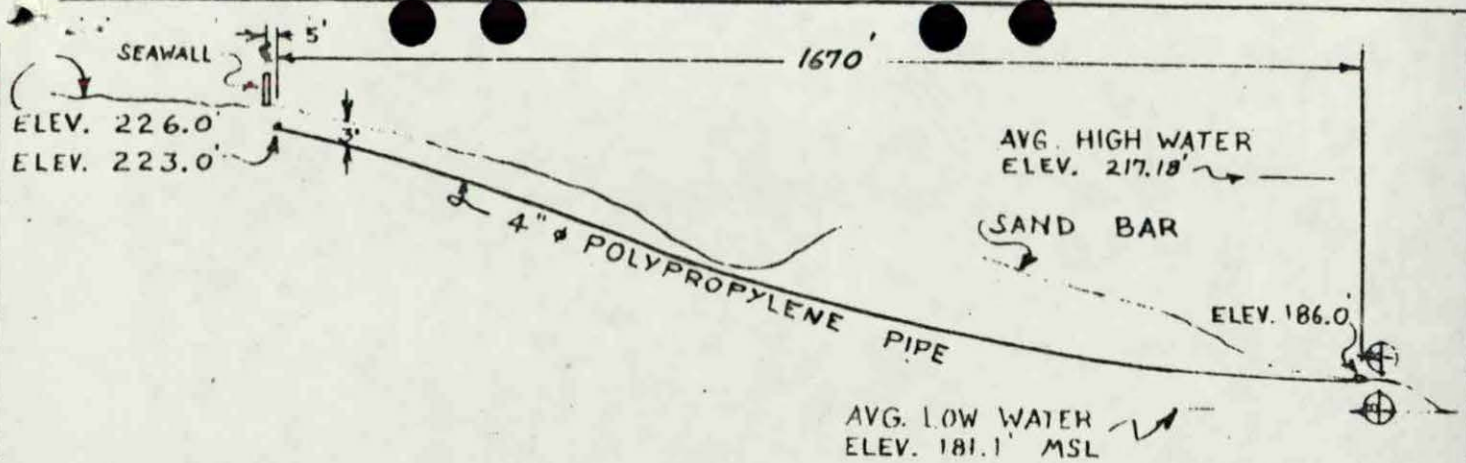
SCALE 1" = 833.33'

REF: U.S. CORPS OF ENGRS
HYDROGRAPHIC SURVEY
JUNE 1978

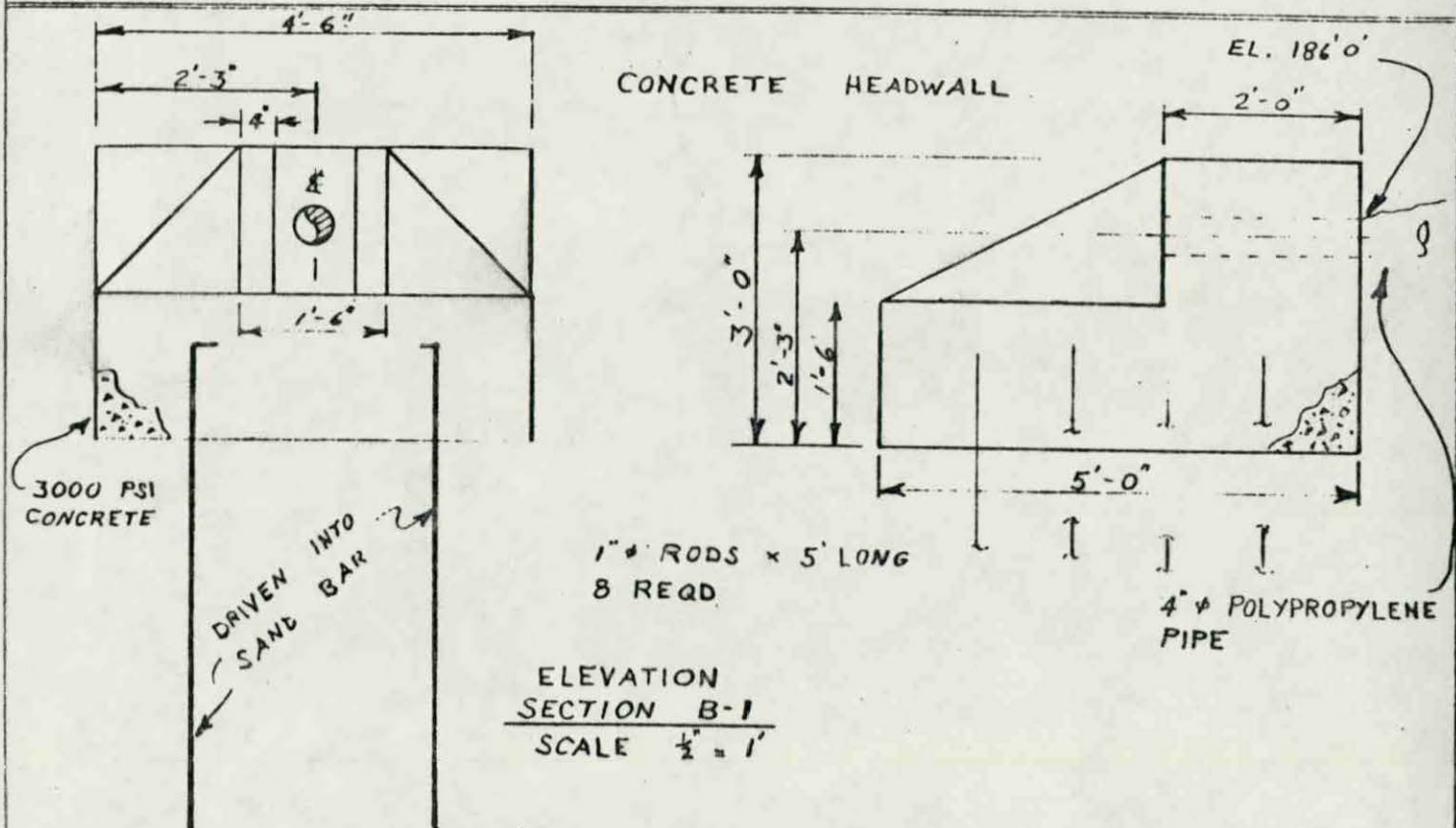


PURPOSE: EFFLUENT DISCHARGE STRUCTURE
DATUM: 0 GAGE AT MILE 732.9 = 183.91' MSL
ADJACENT PROPERTY OWNERS: W.D. GEORGE -
N MISSISSIPPI RIVER DEARMONT OLIVER
AT WEST MEMPHIS, ARKANSAS
COUNTY OF CRITTENDEN, STATE OF ARKANSAS
APPLICATION BY CHEMFORM CORP. DATE 21 SEPT 78

SHEET 1 OF 2



ELEVATION
SECTION A-1
SCALE 1" = 300' HORIZ
SCALE 1" = 30' VERT



ELEVATION
SECTION B-1
SCALE 1/2" = 1'

REVISION

CHEMFORM CORPORATION
PROPOSED
EFFLUENT PIPELINE
21 SEPT 78
SHEET 2 OF 2

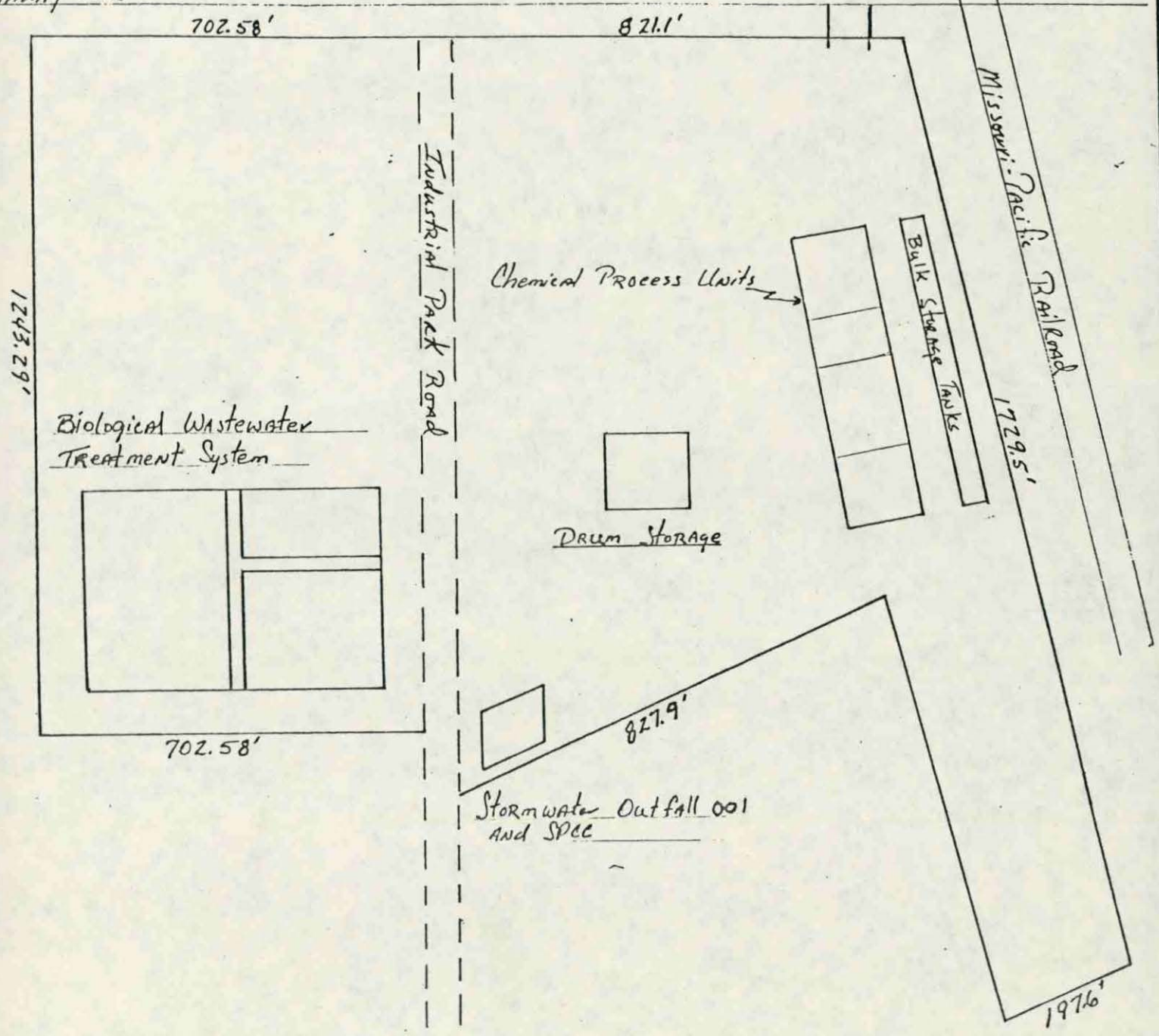
VERTAC CHEMICAL CORPORATION

24th Floor • 5100 Poplar • Memphis, TN 38137 • 901-767-6851

REPLY TO: P. O. BOX 2648
WEST HELENA, AR 72390
(501) 572-3701

To Hwy 49 →

Highway 242



J.E. Porter 11/80



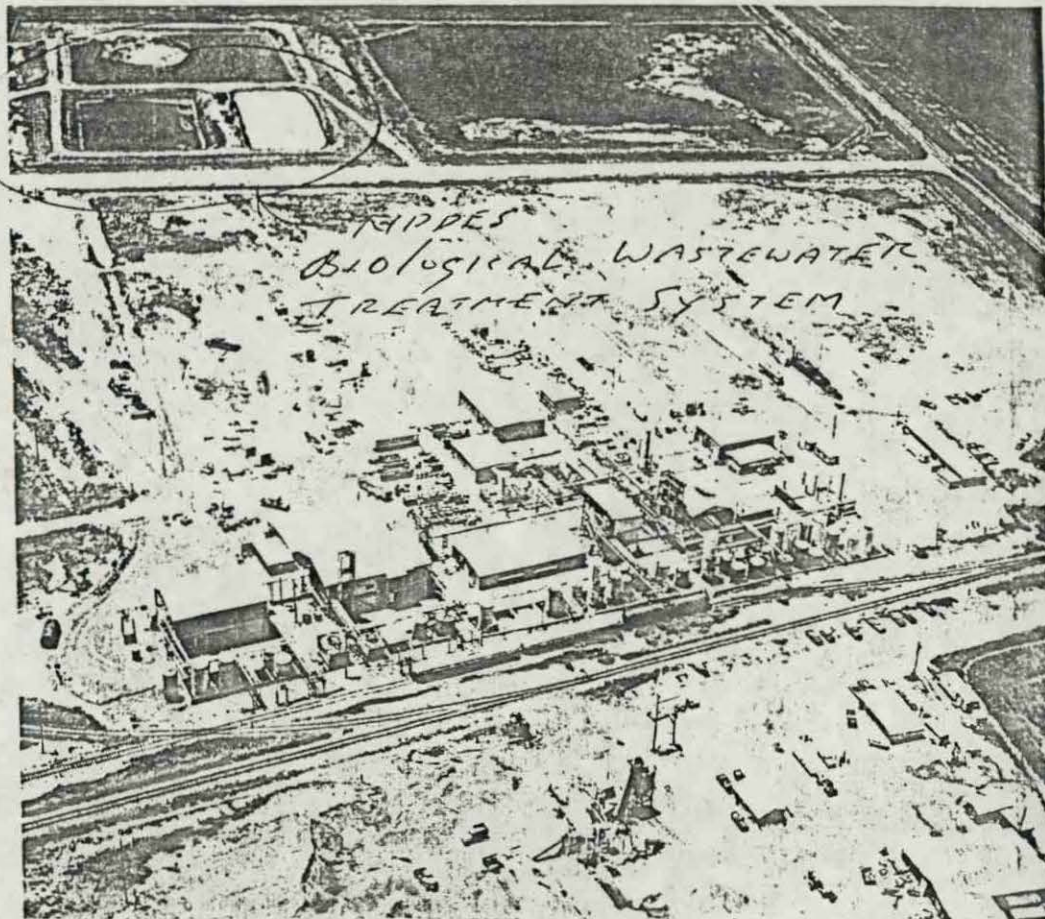
ITEM VI
FORM 3
VERTAC CHEMICAL CORPORATION

24th Floor • 5100 Poplar • Memphis, TN 38137 • 901-767-6851

TECHNICAL DATA SHEET

West Helena, Arkansas

Established on a 48-acre industrial site four miles from the Mississippi River, the West Helena Plant specializes in custom manufacturing and has a wide selection of multi-functional custom processing units.



AERIAL
PHOTOGRAPH

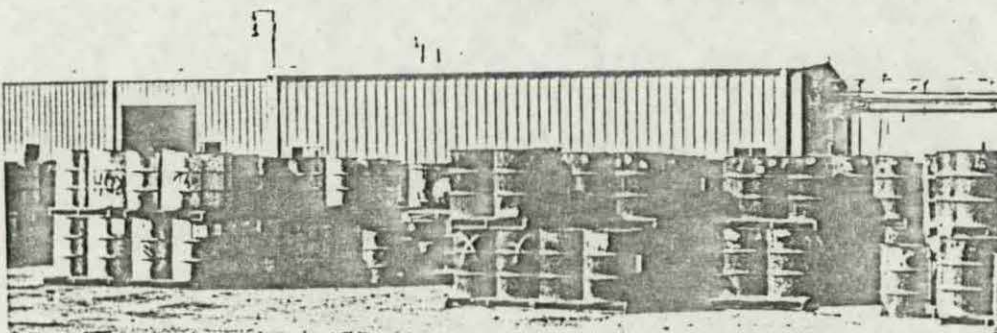
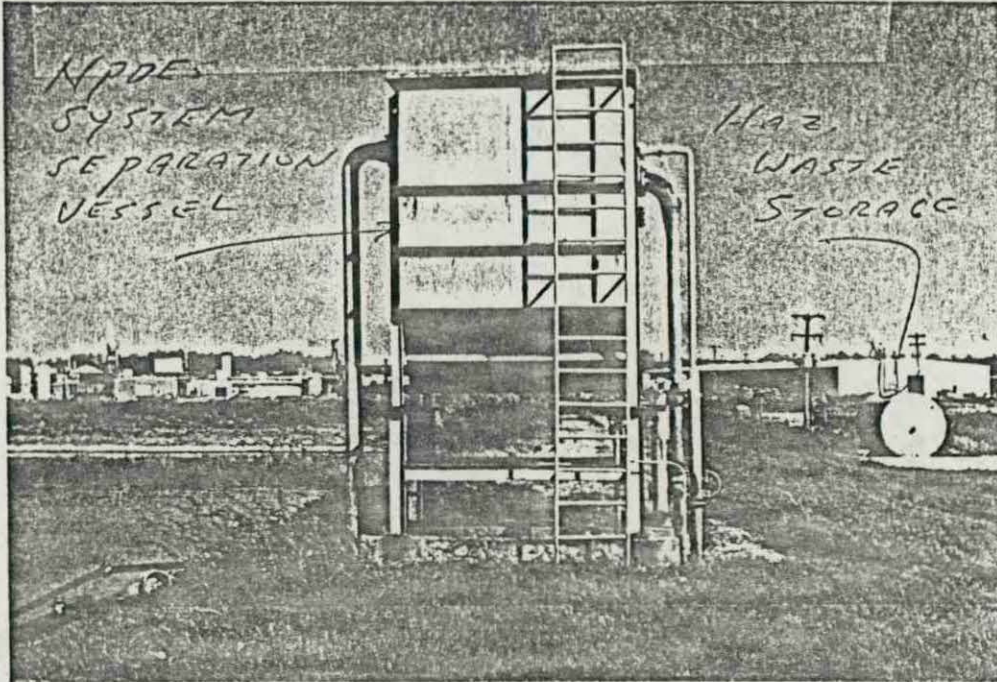




VERTAC CHEMICAL CORPORATION

24th Floor • 5100 Poplar • Memphis, TN 38137 • 901-767-6851

TECHNICAL DATA SHEET



Drum Storage Area

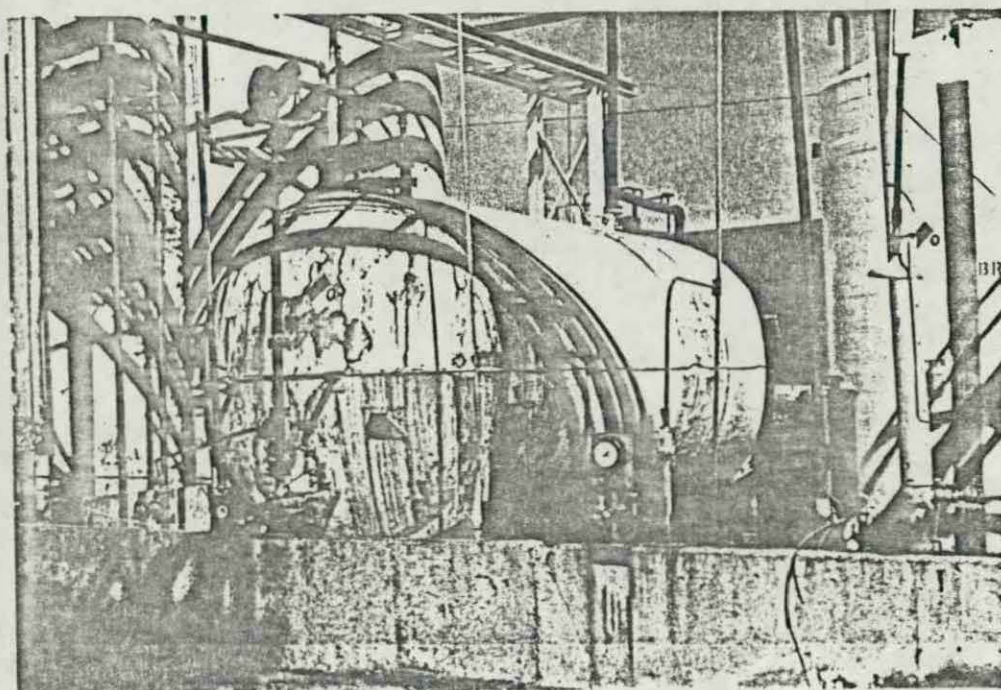
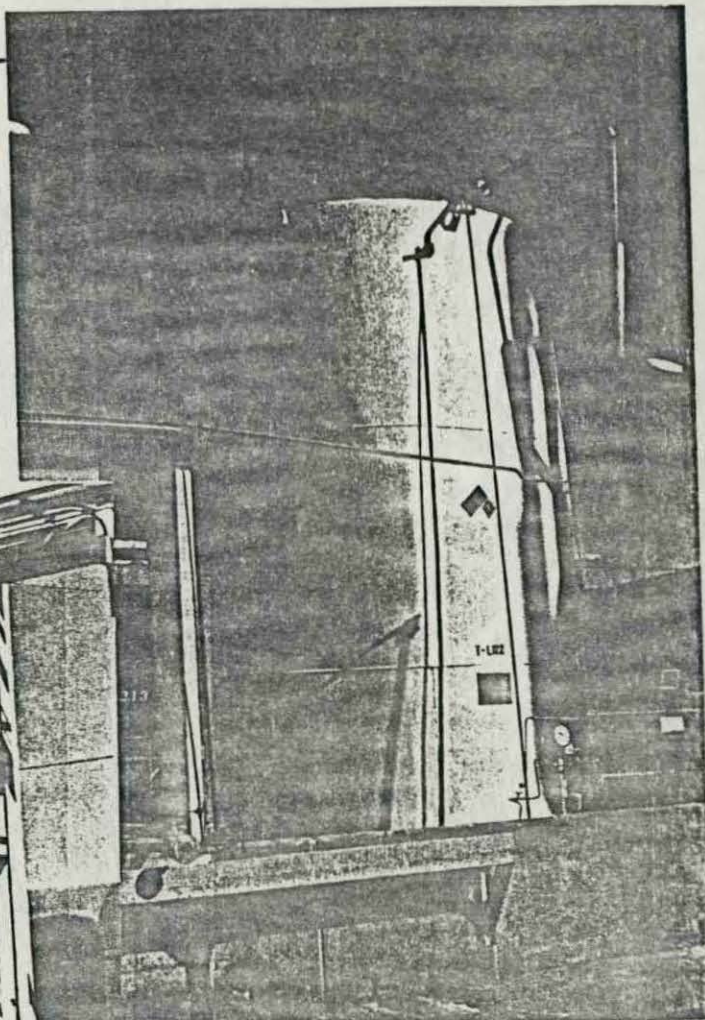
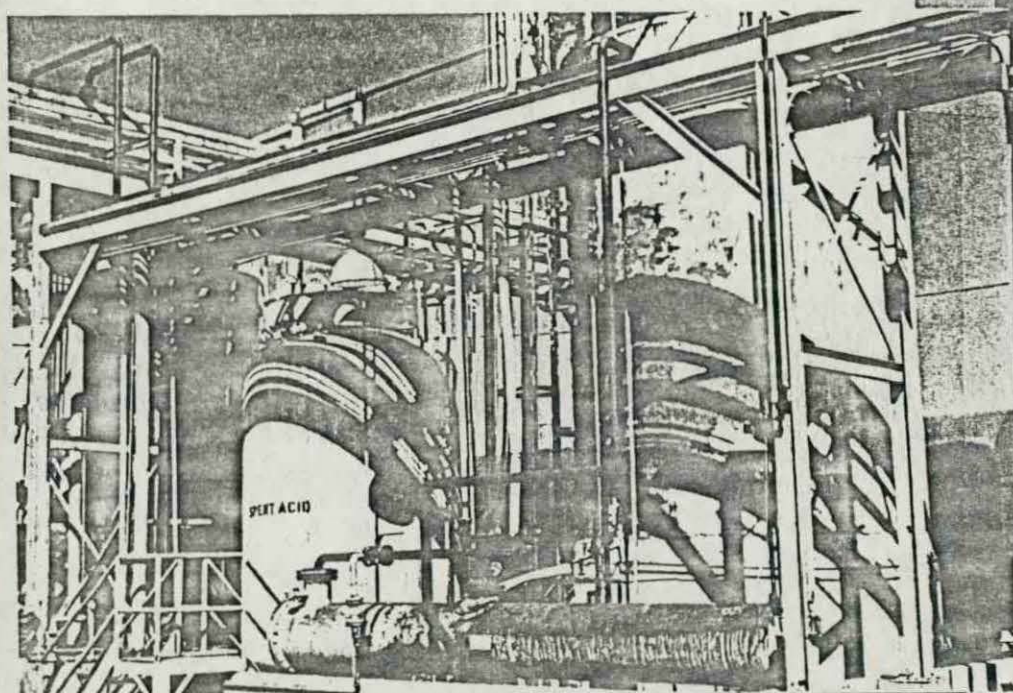


VERTAC CHEMICAL CORPORATION

24th Floor • 5100 Poplar • Memphis, TN 38137 • 901-767-6851

TECHNICAL DATA SHEET

*HAZARDOUS
WASTE
STORAGE
VESSELS*



Schedule AFacilities and Cost Estimates

Vertac Chemical Corporation
West Helena Plant
P. O. Box 2648
West Helena, Arkansas 72390

EPA ID# ARD 990660649

Closure	<u>\$25,400</u>
Total	\$25,400

Schedule B

The Fund shall be established by the initial deposit hereunder by Grantor in the sum of Thirteen Thousand Five Hundred Dollars (\$13,500), plus interest thereon, as a result of the termination of a previously existing Trust Agreement between the Grantor and First National Bank, Vicksburg, Mississippi, containing substantially identical terms as the foregoing Trust Agreement, said Trust Agreement having been terminated incident to the foregoing Trust.

Exhibit A

List of persons designated by Vertac who are authorized to
give orders and instructions to the Trustee:

CONFIDENTIAL MATERIAL REMOVED

INFORMATION HAS BEEN REMOVED FROM THIS FILE
BECAUSE IT IS OF A CONFIDENTIAL NATURE.

THIS INFORMATION MAY BE ACCESSED ONLY BY
MANAGEMENT STAFF AND MAY BE OBTAINED BY
REQUEST TO THE RECORDS LEADWORKER.

WHEN REQUESTING CONFIDENTIAL INFORMATION
FOR THIS FILE, PLEASE REFER TO THE FOL-
LOWING FILE NAME/NUMBER.

Confidential File Name

Ventac - W. Helina

Number

CONF: 23-1

54-0068

CERTIFIED MAIL 957469
RETURN RECEIPT REQUESTED

July 2, 1981

Mr. Joe Porter
Vertac Chemical Corporation
West Helena Plant
Highway 242
West Helena, AR 72390

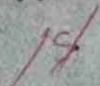
Dear Mr. Porter:

It has been brought to my attention that you have questioned the applicability of the Interim Status Standards in Arkansas. You related to our inspector during a recent RCRA inspection that, on the basis of 40CFR 265.1(c)(4), you do not feel that the federal standards of Part 265 apply to the Vertac West Helena Plant or other Arkansas hazardous waste management facilities. Your opinion, as I understand it, is that the exemption stated in §265.1(c)(4) relieves Arkansas facilities from the interim status standards because the Arkansas Hazardous Waste Management Code adopted the federal regulations.

The paragraph you referenced states that the Part 265 standards do not apply to facilities in a state with an authorized RCRA hazardous waste program. I must point out that a state program cannot be authorized unless it is substantially equivalent to the federal program. Please refer to 40CFR 123.128(e) which specifically states that "States must have standards applicable to HWM facilities which are substantially equivalent to 40CFR Part 265..." This is a portion of the requirements the Arkansas program met to achieve Interim Authorization. The adoption of the federal regulations as state regulations in effect put the federal standards back into force.

I assure you that the Arkansas hazardous waste program can and will enforce the interim state standards as set forth in 40CFR Part 265 (Section 3 of the Arkansas Hazardous Waste Management Code). Vertac West Helena Plant will be expected to take whatever corrective measures necessary to come into compliance within the time frame specified in the June 23, 1981 letter to you from Mr. Bates. If you wish to discuss this matter with me or members of our hazardous waste staff, please contact this office at your convenience.

Sincerely,


Robert E. Blanz
Deputy Director
Program Operations

REB:fdp
cc: Mike Bates

